

Volkswagen Litigation Information

On September 18, 2015, the EPA sent a letter to Volkswagen telling them that they were in violation of a number of state and federal regulations. The allegations are as follows:

1. That various Volkswagen models were equipped with a “defeat device” What the defeat device does is effect the emission control systems performance. In layman’s language what this means is that while the vehicle is being tested for EPA standards, it operates in a different mode than if it were on the road. The purpose of this is to allow the vehicle to pass EPA Standards, when in reality, the vehicle is emitting up to 40 times the amount of nitrogen oxide.
2. Many of the individuals who have purchased these vehicles were under the illusion that the diesel motors supplied by Volkswagen, and in some Audi vehicles were actually “environmentally friendly” in that, they had very low emissions and also promised improved performance.
3. Specifically, the EPA stated “as described above, the software was designed to track the perimeters of the federal test procedure and cause emission control systems to underperform when the software determined that the vehicle was not undergoing the “federal test procedure”.
4. The most troubling issue, if one is a car enthusiast, is the fact that even though the vehicles may get recalled and supplied with updated software, the overall performance of the vehicle, is going to suffer greatly. If the vehicles need to operate in the mode as required by the EPA, the performance will be diminished by a lack of horsepower, and a decrease in gas mileage. Thus there is a drastic diminishment in the value of the vehicles due to the software recall “fix”.
5. Litigation wise, this case is extraordinarily strong in that Volkswagen has admitted that they attempted to deceive the EPA. In fact, their President has already stated that they have erred, and need to earn back the trust of the American people. Also, Volkswagen has put aside 6.7 billion dollars in order to satisfy the recall and any subsequent claims.
6. The bottom line is that Volkswagen put on a “defeat device” in order to deceive the customer in to thinking they were getting a vehicle with low emissions, and high performance. Once that software is reprogrammed, those vehicles will have less horsepower, lower gas mileage and will not be the low emission vehicle that many people thought they were purchasing.



The following vehicles are subject to recall:

Model Year	EPA Test Group	Make and Model(s)
2009	9VWXV02.035N	VW Jetta, VW Jetta Sportwagen
2009	9VWXV02.0U5N	VW Jetta, VW Jetta Sportwagen
2010	AVWXV02.0U5N	VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2011	BVWXV02.0U5N	VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2012	CVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2012	CVWXV02.0U4S	VW Passat
2013	DVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2013	DVWXV02.0U4S	VW Passat
2014	EVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2014	EVWXV02.0U4S	VW Passat
2015	FVGAV02.0VAL	VW Beetle, VW Beetle Convertible, VW Golf, VW Golf Sportwagen, VW Jetta, VW Passat, Audi

In order to pursue a claim, the owner of the vehicle will have to produce some sort of documentation indicating that they purchased a vehicle, that they still own the vehicle, explain the reasons why they pursued the "TBI engine" which is the name of the diesel motor, the amount of money they paid for the vehicle, where they purchased it (which dealership), and how long they have owned the vehicle.

This is some basic information, but I am attaching as an exhibit, the letter from the EPA, which goes into great detail about the SCAM.



Matthew Rodriguez
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chair
8480 Telstar Avenue, Suite 4
El Monte, California 91734 • www.arb.ca.gov



Edmund G. Brown Jr.
Governor

Reference No. IUC-2015-007

September 18, 2015

Volkswagen AG
Audi AG
Volkswagen Group of America, Inc.
Through:

David Geanakopoulos
Executive Vice President and General Counsel, Government Affairs
Volkswagen Group of America
2200 Ferdinand Porsche Drive
Hamden, VA 20171

Stuart Johnson
General Manager
Engineering and Environmental Office
Volkswagen Group of America
3800 Hamlin Road
Auburn Hills, MI 48326

Re: Admission of Defeat Device and California Air Resources Board's Requests

Dear Mr. Geanakopoulos and Mr. Johnson:

In order to protect public health and the environment from harmful pollutants, the California Air Resources Board (CARB) rigorously implements its vehicle regulations through its certification, in use compliance, and enforcement programs. In addition to the new vehicle certification process, CARB regularly tests automobiles to ensure their emissions performance is as expected throughout their useful life, and performs investigative testing if warranted. CARB was engaged in dialogue with our European counterparts concerning high in use emissions from light duty diesels. CARB deployed a number of efforts using portable measurement systems and other approaches to increase our understanding for the California fleet. In 2014, the International Council for Clean Transportation (ICCT) and West Virginia University (WVU) identified through their test program, and brought to the CARB's and the United States Environmental Protection Agency's (EPA) attention, concerns of elevated oxides of nitrogen (NOx) emissions over real world driving. The ICCT actions were consistent and

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California Environmental Protection Agency

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Mr. Geanakopoulos and Mr. Johnson:
September 18, 2015
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complementary to our activities. This prompted CARB to start an investigation and discussions with the Volkswagen Group of America (VW) on the reasons behind these high NOx emissions observed on their 2.0 liter diesel vehicles over real world driving conditions. As you know, these discussions over several months culminated in VW's admission in early September 2015 that it has, since model year 2009, employed a defeat device to circumvent CARB and the EPA emission test procedures.

VW initiated testing to replicate the ICCT/WVU testing and identify the technical reasons for the high on-road emissions. VW shared the results of this testing and a proposed recalibration fix for the Gen1 (Lean NOx Trap technology) and Gen2 (Selective Catalytic Reduction (SCR) technology) with CARB staff on December 2, 2014. Based on this meeting, CARB and EPA at that time agreed that VW could implement the software recall; however, CARB cautioned VW that if our confirmatory testing showed that the fix did not address the on-road NOx issues, they would have to conduct another recall. Based on this meeting, VW initiated a voluntary recall in December 2014 which, according to VW, affected approximately 500,000 vehicles in the United States (~50,000 in California). The recall affected all 2009 to 2014 model-year diesel fueled vehicles equipped with Gen1 and Gen2 technology. This recall was claimed to have fixed among other things, the increased real world driving NOx issue.

CARB commenced confirmatory testing on May 6, 2015 to determine the efficacy of the recall on both the Gen1 and Gen2 vehicles. CARB confirmatory testing was completed on a 2012 model-year Gen2 VW, test group CVWX02.0U4S, to be followed with Gen1 testing. CARB staff tested this vehicle on required certification cycles (FTP, US08 and HWFET) and over-the-road using a Portable Emission Measurement Systems (PEMS). On some certification cycles, the recall calibration resulted in the vehicle failing the NOx standard. Over-the-road PEMS testing showed that the recall calibration did reduce the emissions to some degree but NOx emissions were still significantly higher than expected.

To have a more controlled evaluation of the high NOx observed over the road, CARB developed a special dynamometer cycle which consisted of driving the Phase 2 portion of the FTP repeatedly. This special cycle revealed that VW's recall calibration did increase Diesel Exhaust Fluid (DEF) dosing upon initial startup; however, dosing was not sufficient to keep NOx emission levels from rising throughout the cycle. This resulted in uncontrolled NOx emissions despite the SCR reaching sufficient operating temperatures.

CARB shared its test results with VW on July 8, 2015. CARB also shared its results with the EPA. Several technical meetings with VW followed where VW disclosed that Gen1, Gen2 and the 2015 model-year Improved SCR vehicle (known as the Gen3) had a second calibration intended to run only during certification testing. During a meeting on September 3, 2015, VW admitted to CARB and EPA staff that these vehicles were

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Mr. Geanacopoulos and Mr. Johnson.
September 18, 2015
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designed and manufactured with a defeat device to bypass, defeat, or render inoperative elements of the vehicles' emission control system. This defeat device was neither described nor justified in the certification applications submitted to EPA and CARB. Therefore, each vehicle so equipped would not be covered by a valid federal Certificate of Conformity (COC) or CARB Executive Order (EO) and would be in violation of federal and state law.

Based upon our testing and discussions with VW, CARB has determined that the previous recall did not address the high on-road NOx emissions, and also resulted in the vehicle failing certification standards. Therefore, the recall is deemed ineffective and is deemed unapproved. VW must immediately initiate discussions with CARB to determine the appropriate corrective action to rectify the emission non-compliance and return these vehicles to the claimed certified configuration. CARB program and enforcement staff is prepared to work closely with VW to find corrective actions to bring these vehicles into compliance.

CARB has also initiated an enforcement investigation of VW regarding all model-year 2009 through 2015 light-duty diesel vehicles equipped with 2.0 liter engines. We expect VW's full cooperation in this investigation so this issue can be addressed expeditiously and appropriately.

Sincerely,



Annette Hebert, Chief
Emissions Compliance, Automotive Regulations and Science Division

cc: Mr. Byron Bunker, Director
Compliance Division
Office of Transportation and Air Quality
Office of Air and Radiation
U.S. Environmental Protection Agency

Mr. Lino Wehrly, Director
Environmental Protection Agency
Light-Duty Vehicle Center
2000 Traverwood Drive
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Dr. Todd P. Sax, Chief
Enforcement Division
California Air Resources Board

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California Environmental Protection Agency

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 18 2015

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

*VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED*

Volkswagen AG
Audi AG
Volkswagen Group of America, Inc.
Thru:

David Geanakopoulos
Executive Vice President Public Affairs and General Counsel
Volkswagen Group of America, Inc.
2200 Ferdinand Porsche Drive
Herndon, VA 20171

Stuart Johnson
General Manager
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326

Re: Notice of Violation

Dear Mr. Geanakopoulos and Mr. Johnson:

The United States Environmental Protection Agency (EPA) has investigated and continues to investigate Volkswagen AG, Audi AG, and Volkswagen Group of America (collectively, VW) for compliance with the Clean Air Act (CAA), 42 U.S.C. §§ 7401-7671q, and its implementing regulations. As detailed in this Notice of Violation (NOV), the EPA has determined that VW manufactured and installed defeat devices in certain model year 2009 through 2015 diesel light-duty vehicles equipped with 2.0 liter engines. These defeat devices bypass, defeat, or render inoperative elements of the vehicles' emission control system that exist to comply with CAA emission standards. Therefore, VW violated section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B). Additionally, the EPA has determined that, due to the existence of the defeat

devices in these vehicles, these vehicles do not conform in all material respects to the vehicle specifications described in the applications for the certificates of conformity that purportedly cover them. Therefore, VW also violated section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1), by selling, offering for sale, introducing into commerce, delivering for introduction into commerce, or importing these vehicles, or for causing any of the foregoing acts.

Law Governing Alleged Violations

This NOV arises under Part A of Title II of the CAA, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. In creating the CAA, Congress found, in part, that “the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare.” CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2). Congress’ purpose in creating the CAA, in part, was “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare and the productive capacity of its population,” and “to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution.” CAA § 101(b)(1)–(2), 42 U.S.C. § 7401(b)(1)–(2). The CAA and the regulations promulgated thereunder aim to protect human health and the environment by reducing emissions of nitrogen oxides (NOx) and other pollutants from mobile sources of air pollution. Nitrogen oxides are a family of highly reactive gases that play a major role in the atmospheric reactions with volatile organic compounds (VOCs) that produce ozone (smog) on hot summer days. Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and congestion. Breathing ozone can also worsen bronchitis, emphysema, and asthma. Children are at greatest risk of experiencing negative health impacts from exposure to ozone.

The EPA’s allegations here concern light-duty motor vehicles for which 40 C.F.R. Part 86 sets emission standards and test procedures and section 203 of the CAA, 42 U.S.C. § 7522, sets compliance provisions. Light-duty vehicles must satisfy emission standards for certain air pollutants, including NOx. 40 C.F.R. § 86.1811-04. The EPA administers a certification program to ensure that every vehicle introduced into United States commerce satisfies applicable emission standards. Under this program, the EPA issues certificates of conformity (COCs), and thereby approves the introduction of vehicles into United States commerce.

To obtain a COC, a light-duty vehicle manufacturer must submit a COC application to the EPA for each test group of vehicles that it intends to enter into United States commerce. 40 C.F.R. § 86.1843-01. The COC application must include, among other things, a list of all auxiliary emission control devices (AECDs) installed on the vehicles. 40 C.F.R. § 86.1844-01(d)(11). An AECD is “any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system.” 40 C.F.R. § 86.1803-01. The COC application must also include “a justification for each AECD, the parameters they sense and control, a detailed justification of each AECD that results in a reduction in effectiveness of the emission control system, and [a] rationale for why it is not a defeat device.” 40 C.F.R. § 86.1844-01(d)(11).

A defeat device is an AECD “that reduces the effectiveness of the emission control system under conditions which may reasonably be expected to be encountered in normal vehicle operation and

use, unless. (1) Such conditions are substantially included in the Federal emission test procedure; (2) The need for the AECD is justified in terms of protecting the vehicle against damage or accident; (3) The AECD does not go beyond the requirements of engine starting; or (4) The AECD applies only for emergency vehicles . . .” 40 C.F.R. § 86.1803-01.

Motor vehicles equipped with defeat devices, such as those at issue here, cannot be certified. EPA, *Advisory Circular Number 24 Prohibition on use of Emission Control Defeat Device* (Dec. 11, 1972); see also 40 C.F.R. §§ 86-1809-01, 86-1809-10, 86-1809-12. Electronic control systems which may receive inputs from multiple sensors and control multiple actuators that affect the emission control system’s performance are AECDs. EPA, *Advisory Circular Number 24-2: Prohibition of Emission Control Defeat Devices – Optional Objective Criteria* (Dec. 6, 1978). “Such elements of design could be control system logic (i.e., computer software), and/or calibrations, and/or hardware items.” *Id.*

“Vehicles are covered by a certificate of conformity only if they are in all material respects as described in the manufacturer’s application for certification . . .” 40 C.F.R. § 86.1848-10(c)(6). Similarly, a COC issued by EPA, including those issued to VW, state expressly, “[t]his certificate covers only those new motor vehicles or vehicle engines which conform, in all material respects, to the design specifications” described in the application for that COC. See also 40 C.F.R. §§ 86.1844-01 (listing required content for COC applications), 86.1848-01(b) (authorizing the EPA to issue COCs on any terms that are necessary or appropriate to assure that new motor vehicles satisfy the requirements of the CAA and its regulations).

The CAA makes it a violation “for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use” CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B); 40 C.F.R. § 86.1854-12(a)(3)(ii). Additionally, manufacturers are prohibited from selling, offering for sale, introducing into commerce, delivering for introduction into commerce, or importing, any new motor vehicle unless that vehicle is covered by an EPA-issued COC. CAA § 203(a)(1), 42 U.S.C. § 7522(a)(1); 40 C.F.R. § 86.1854-12(a)(1). It is also a violation to cause any of the foregoing acts. CAA § 203(a), 42 U.S.C. § 7522(a); 40 C.F.R. § 86-1854-12(a)

Alleged Violations

Each VW vehicle identified by the table below has AECDs that were not described in the application for the COC that purportedly covers the vehicle. Specifically, VW manufactured and installed software in the electronic control module (ECM) of these vehicles that sensed when the vehicle was being tested for compliance with EPA emission standards. For ease of reference, the EPA is calling this the “switch.” The “switch” senses whether the vehicle is being tested or not based on various inputs including the position of the steering wheel, vehicle speed, the duration of the engine’s operation, and barometric pressure. These inputs precisely track the parameters of the federal test procedure used for emission testing for EPA certification purposes. During EPA

emission testing, the vehicles' ECM ran software which produced compliant emission results under an ECM calibration that VW referred to as the "dyno calibration" (referring to the equipment used in emissions testing, called a dynamometer). At all other times during normal vehicle operation, the "switch" was activated and the vehicle ECM software ran a separate "road calibration" which reduced the effectiveness of the emission control system (specifically the selective catalytic reduction or the lean NOx trap). As a result, emissions of NOx increased by a factor of 10 to 40 times above the EPA compliant levels, depending on the type of drive cycle (e.g., city, highway).

The California Air Resources Board (CARB) and the EPA were alerted to emissions problems with these vehicles in May 2014 when the West Virginia University's (WVU) Center for Alternative Fuels, Engines & Emissions published results of a study commissioned by the International Council on Clean Transportation that found significantly higher in-use emissions from two light duty diesel vehicles (a 2012 Jetta and a 2013 Passat). Over the course of the year following the publication of the WVU study, VW continued to assert to CARB and the EPA that the increased emissions from these vehicles could be attributed to various technical issues and unexpected in-use conditions. VW issued a voluntary recall in December 2014 to address the issue. CARB, in coordination with the EPA, conducted follow up testing of these vehicles both in the laboratory and during normal road operation to confirm the efficacy of the recall. When the testing showed only a limited benefit to the recall, CARB broadened the testing to pinpoint the exact technical nature of the vehicles' poor performance, and to investigate why the vehicles' onboard diagnostic system was not detecting the increased emissions. None of the potential technical issues suggested by VW explained the higher test results consistently confirmed during CARB's testing. It became clear that CARB and the EPA would not approve certificates of conformity for VW's 2016 model year diesel vehicles until VW could adequately explain the anomalous emissions and ensure the agencies that the 2016 model year vehicles would not have similar issues. Only then did VW admit it had designed and installed a defeat device in these vehicles in the form of a sophisticated software algorithm that detected when a vehicle was undergoing emissions testing.

VW knew or should have known that its "road calibration" and "switch" together bypass, defeat, or render inoperative elements of the vehicle design related to compliance with the CAA emission standards. This is apparent given the design of these defeat devices. As described above, the software was designed to track the parameters of the federal test procedure and cause emission control systems to underperform when the software determined that the vehicle was not undergoing the federal test procedure.

VW's "road calibration" and "switch" are AECDs¹ that were neither described nor justified in the applicable COC applications, and are illegal defeat devices. Therefore each vehicle identified by the table below does not conform in a material respect to the vehicle specifications described in the COC application. As such, VW violated section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1), each time it sold, offered for sale, introduced into commerce, delivered for introduction into commerce, or imported (or caused any of the foregoing with respect to) one of the hundreds of thousands of new motor vehicles within these test groups. Additionally, VW

¹ There may be numerous engine maps associated with VW's "road calibration" that are AECDs, and that may also be defeat devices. For ease of description, the EPA is referring to these maps collectively as the "road calibration."

violated section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), each time it manufactured and installed into these vehicles an ECM equipped with the “switch” and “road calibration.”

The vehicles are identified by the table below. All vehicles are equipped with 2.0 liter diesel engines.

Model Year	EPA Test Group	Make and Model(s)
2009	9VWXV02.035N	VW Jetta, VW Jetta Sportwagen
2009	9VWXV02.0U5N	VW Jetta, VW Jetta Sportwagen
2010	AVWXV02.0U5N	VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2011	BVWXV02.0U5N	VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2012	CVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2012	CVWXV02.0U4S	VW Passat
2013	DVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2013	DVWXV02.0U4S	VW Passat
2014	EVWXV02.0U5N	VW Beetle, VW Beetle Convertible, VW Golf, VW Jetta, VW Jetta Sportwagen, Audi A3
2014	EVWXV02.0U4S	VW Passat
2015	FVGAV02.0VAL	VW Beetle, VW Beetle Convertible, VW Golf, VW Golf Sportwagen, VW Jetta, VW Passat, Audi A3

Enforcement

The EPA's investigation into this matter is continuing. The above table represents specific violations that the EPA believes, at this point, are sufficiently supported by evidence to warrant the allegations in this NOV. The EPA may find additional violations as the investigation continues.

The EPA is authorized to refer this matter to the United States Department of Justice for initiation of appropriate enforcement action. Among other things, persons who violate section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), are subject to a civil penalty of up to \$3,750 for each violation that occurred on or after January 13, 2009;^[1] CAA § 205(a), 42 U.S.C. § 7524(a), 40 C.F.R. § 19.4. In addition, any manufacturer who, on or after January 13, 2009, sold, offered for sale, introduced into commerce, delivered for introduction into commerce, imported, or caused any of the foregoing acts with respect to any new motor vehicle that was not covered by an EPA-issued COC is subject, among other things, to a civil penalty of up to \$37,500 for each violation.^[2] CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4. The EPA may seek, and district courts may order, equitable remedies to further address these alleged violations. CAA § 204(a), 42 U.S.C. § 7523(a).

^[1] \$2,750 for violations occurring prior to January 13, 2009

^[2] \$32,500 for violations occurring prior to January 13, 2009

The EPA is available to discuss this matter with you. Please contact Meetu Kaul, the EPA attorney assigned to this matter, to discuss this NOV. Ms. Kaul can be reached as follows:

Meetu Kaul
U.S. EPA, Air Enforcement Division
1200 Pennsylvania Avenue, NW
William Jefferson Clinton Federal Building
Washington, DC 20460
(202) 564-5472
kaul.meetu@epa.gov

Sincerely,



Phillip A. Brooks
Director
Air Enforcement Division
Office of Civil Enforcement

Copy:

Todd Sax, California Air Resources Board
Walter Benjamin Fisherow, United States Department of Justice
Stuart Drake, Kirkland & Ellis LLP

Volkswagen Case Information Sheet

Full name:

Address:

County:

Email address:

Phone number:

Vehicle VIN#:

Driver's license #:

Social Security #:

Date of birth:

Vehicle make/model/year:

Purchase location:

Purchase date:

Purchase price:

Finance company:

Did you lease or purchase this vehicle?

Please attach images of:

- Purchase paperwork
- Copy of Driver's License



Hoja de información para el caso de Volkswagen

Nombre completo

Dirección

Condado

Dirección de correo electrónico

Número de teléfono

Vehículo VIN #

Numero de licencia #

Seguro social #

Fecha de nacimiento

Marca/modelo/año del vehículo

Lugar de donde compro el vehículo

Fecha de cuando compro

Precio de compra

Compañía financiera

¿Arrendar o comprar este vehículo?

Adjuntar imágenes de:

- Trámites de compra
- Copia de licencia de conducir



November 9, 2015

Dear Customer:

According to our information, you own or lease a Volkswagen vehicle affected by the 2.0L TDI® emissions issue. As we work tirelessly to develop a remedy, we ask for your continued patience.

In the meantime, we would like to give you a \$500 Volkswagen Prepaid Visa® Loyalty Card, a \$500 Volkswagen Dealership Card, and 24-hour Roadside Assistance at no charge for 3 years.* We sincerely hope you see this goodwill gesture as a first step toward restoring your invaluable trust.

To learn more, please visit www.vwdieselinfo.com. Click on the blue box on the website, and then enter your Vehicle Identification Number (VIN) in the designated space. If you do not know how to locate your VIN, please consult your Owner's Manual. After entering your VIN, follow the instructions on how to receive and activate the Goodwill Package.*

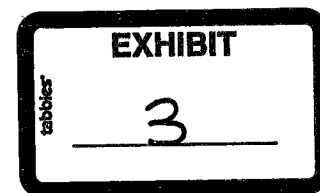
It is important to emphasize that this is an emissions issue and that the Environmental Protection Agency has stated that your car remains safe and legal to drive.

If you have questions or concerns, please contact our Customer CARE Center at vwcustomercare@vw.com or 1-800-822-8987.

Thank you and best regards,

A handwritten signature in black ink, appearing to read 'M. Horn'.

Michael Horn
President and CEO
Volkswagen Group of America, Inc.



*Goodwill Package available only to registered owners of affected vehicles who can provide VIN and other requested verification data. Not transferable, limit one per affected vehicle as confirmed by unique VIN. Affected owners must register for the Goodwill Package by April 30, 2016, and activate at dealership. See vwdieselinfo.com or call 1-800-822-8987 for eligibility, registration, and activation requirements. Volkswagen Prepaid Visa Loyalty Cards are issued by MetaBank®, Member FDIC, pursuant to a license from Visa U.S.A. Inc. This card can be used anywhere Visa debit cards are accepted. Dealership card can only be used at participating Volkswagen of America dealerships. Both cards expire one year after date of issuance. Void where prohibited.

INTRO LETTER TO NEW CLIENTS WHO SIGNED LATER IN YEAR

['CONTRACT MUST BE DATED BEFORE JUNE 28, 2016]

Our law firm (The Law Offices of Maloney & Campolo) is working with _____ on your case against Volkswagen. Please take note that we will be your main point of contact from this point forward. To date, all Volkswagen lawsuits are paused until the Volkswagen Class Settlement Program is finalized by the court. We expect this to occur this fall. Soon, we will be given plaintiff fact sheets. We do not know the exact questions that Volkswagen will be asking, but we want to be prepared for any and all questions regarding the history of your vehicle.

To ensure we have all necessary information please send us a copy of the forms below as soon as possible:

- Copy of the vehicle's most recent registration
- Purchase paperwork/lease agreement
- Driver's License
- Copies of all repair orders pertaining to the vehicle (from authorized Volkswagen facilities, as well as any independent repair facilities) (We do not need paperwork for oil changes)
- Signed copy of the co-counsel agreement

Please see the attachment which includes the details of Volkswagen's Class Settlement Program. If you choose to pursue an individual lawsuit, our intent is to ask for a complete refund of your purchase price, attorney fees, and other damages while pursuing various causes of action including fraud, breach of contract, and damages allowed in the state where your vehicle was purchased. You will have the opportunity to choose between their offer or an individual lawsuit. Upon the court finalizing the class settlement program, we will discuss which route you wish to move forward on.

If you ever have any questions regarding this process, please feel free to send me an email or call me. I will be sending you emails whenever new information regarding the class settlement program is available.

Camille Furgeson

Administrative Assistant

cfurgeson@maloneyandcampolo.com



CLIENT FOLDERS - Inventory List

Yes		Yes	Yes			Yes Too small/dark	Yes	Yes		Photo of License Plate & Registration Sticker	
Yes	Yes buyback	Yes	Yes	Yes	6/30/18	Yes		Maint. Rep			
Yes	Yes (Email)	Yes	Yes	Yes Registration Renewal Receipt	6/2017		Yes			Agreement to Provide Insurance TX Disclosure of Equity for Trade-In, Pleadings	
	Yes	Yes	Yes	Yes Manuel/Rumice	3/2017	Yes Manuel	Yes	Yes	Simple Finance Charge		
Yes		Yes	Yes			Yes	Yes				
Yes	Yes	Yes	Yes	Yes		Yes	Yes			Insurance Card	
No Self Reg	No completing himself	Yes	Yes								
Yes	Yes	Yes	Yes	Tax Collector's Receipt for Title App/Registration		Yes					
Yes	Yes	Yes	Yes	Yes Karla/Ruben		Yes Karla		Yes	Loan Agreement	Inspection Report, Insurance Card	
Yes		Yes	Yes				Yes				
Yes	Yes buyback	Yes	Yes				Yes		Yes		
Yes		Yes	Yes								
Yes		Yes	Yes	Yes Ricardo/Dalia		Yes Ricardo	Yes		Loan Account Snapshot	Inspection Report	
Yes Self Reg	Yes	Yes	Yes	Yes	3/2017	Yes			Simple Finance Charge		
Yes	Yes	Yes	Yes			Yes Both			Loan Account Snapshot & Simple Finance Charge		
Yes	Lawsuit	Yes	Yes	Yes Douglas/Susan	06/30/2016	Yes Douglas	Yes				
Reprint	Yes buyback	Yes	Yes	Yes Douglas/Susan	01/31/17		Yes Lease & Purchase Paperwork				
Yes	Yes buyback	Yes	Yes	Yes		Yes	Yes-need better copy				
Yes	Yes buyback	Yes	Yes			Yes both	Yes				
Yes	Yes	Yes	Yes								Yes
No Missing info		Yes	Yes								
Yes	Yes	Yes	Yes	Yes Mark/Mary	2/2017	Yes Mark	Yes		Simple Finance Charge	Insurance	
Yes	Yes	Yes	Yes	Yes							
Yes		Yes	Yes	Yes Michelle	11/2016	Yes Michelle	Yes Michelle/Manuel		Simple Finance Charge		
Yes	Yes buyback	Yes	Yes	Yes Kenneth/Katherine	03/31/17	Yes Both		Maint			
		Yes	Yes				Yes			Deceased Contact Gary Sanders	
Yes	Yes	Yes	Yes	Yes	12/2016	Yes			Blurry		
Yes		Yes	Yes	Yes	10/31/2016	Yes	Yes				
Yes		Yes	Yes			Yes	Yes				
Yes	Yes	Yes	Yes			Yes			Finance Screenshot		
Yes	Yes	Yes	Yes	Yes	1/31/2017	Yes	Yes	Yes		Insurance, Inspection	
	Yes buyback	Yes	Yes			Yes	Yes				
Yes	Yes	Yes	Yes	Yes	7/2017	Yes			Simple Finance Charge		
		Yes	Yes							Car Repossessed	
Yes		Yes	Yes	Yes	12/2016	Yes		Yes	Simple Finance Charge & Loan Account Snapshot		
Yes (Jetta)	Yes buyback	Yes	Yes	Yes George/Terr		Yes George	Yes		Yes		
Print (Gold)	Yes buyback			Yes George only	09/30/16	Yes					
Yes	Yes	Yes	Yes	Yes	8/2017	Yes	Yes				
Yes	Yes buyback	Yes	Yes	Yes	02/2017	Yes	Yes				
Yes	Yes buyback	Yes	Yes	Yes Robert/Margaret	04/30/17	Yes Both			Yes		
Yes		Yes	Yes	Yes	06/30/17	Yes	Yes				
Yes		Yes	Yes	Yes Registration Renewal Receipt	2/2017	Yes	Reprint	Reprint		Tax Collector's Receipt for Title Application (Expired) Inspection Insurance	
		Yes	Yes	Yes Bertha/Thomas	2/2017	Yes Bertha Reprint	Yes		Simple Finance Charge	Reprint for Title Application (Expired) Odometer Disclosure, Recall Notice	
Yes	Yes	Yes	Yes	Yes	09/30/2016	Yes			Simple Finance Charge		
Yes	Yes	Yes	Yes	Yes Olivia/Amber		Yes Olivia	Yes	Yes			Yes
No missing info		Yes	Yes								
Yes	Yes	Yes	Yes								
	Yes	Yes	Yes			Yes	Yes			Insurance (Expired) Registration Receipt (Expired)	
Yes	Yes buyback	Yes	Yes			Yes	Yes				
Yes		Yes	Yes	Yes	04/30/18	Yes	Yes		Yes		
Yes		Yes	Yes								
Yes		Yes	Yes	Yes		Yes	Yes	Yes	Simple Finance Charge	Finance Claim Estimate (Collision) Window Tint Receipt	Yes
	Yes	Yes	Yes			Yes	Yes				
Yes	Yes	Yes	Yes	Yes	10/2016	Yes	Yes	Yes	Simple Finance Charge & Loan Account Snapshot	Buyer's Tag	
Yes			Yes	Yes	06/05/17	Yes	Yes				
Yes Eligible Seller		Yes				Yes	Yes				
Yes	Yes	Yes	Yes	Yes Joseph/Martina	3/2017	Yes Joseph			Simple Finance Charge & Loan Account Screens	Reprint Contract	
Yes	Yes	Yes	Yes						Sticky Note Across Simple Finance Charge	Reprint	
Yes	Yes	Yes				Yes	Yes			Registration Sticker Blurry Inspection, SSN Card	
Yes	Yes Lawsuit	Yes				Yes	Yes		Yes		
Yes		Yes	Yes								
		Yes	Yes			Yes			Simple Finance Charge	SSN Card	

EXHIBIT

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tabbles

CLIENT FOLDERS - Inventory List

		Yes	Yes								
Yes	Yes	Yes		Yes	5/2017	Yes	Blurry	Yes	Blurry Simple Finance Charge	Inspection Report	
Yes	Yes buyback	Yes	Yes	Yes	5/2017	Yes	Yes	Malat	Yes		
Yes	Yes (just 1)	Yes	Yes	Yes Coby/Lauren	5/2017	Yes Coby	Yes	Yes		Wire Transfer of Funds	
Yes		Yes	Yes							Buyer's Tag	
Yes		Yes	Yes	Title Application Receipt & Sticker	12/2016	Too Small	Blurry	Yes	Simple Finance Charge		
Yes		Yes	Yes	Yes Alfred/Linda	02/28/17		Yes				
		Yes		Yes Kim/Aaron	5/2016	Yes Kim	Yes		Simple Finance Charge	Application Receipt, Insurance Warranty Reprint Contract	
Yes		Yes	Yes								
	Yes	Yes	Yes	Yes David/Josephine	04/28/18	Yes David	Yes				
Yes		Yes	Yes	Yes	3/2017	Yes			Simple Finance Charge		
Yes		Yes	Yes	Yes	05/31/17	Yes	Yes				
		Yes	Yes								
Yes	Yes	Yes	Yes			Yes	Yes	Yes		Registration Receipt, Odometer Disclosure	
Yes		Yes	Yes	Yes	06/30/17		Yes Lease		Yes		
No missing info		Yes	Yes	Yes	10/31/17		Yes				
Yes	Yes	Yes	Yes	Yes	5/2017				Simple Finance Charge		
	Yes	Yes	Yes	Yes Jesus/Ingrid	4/2017	Yes Both	Yes	Yes		Warranty Photo of Lights	
Yes	Yes	Yes	Yes	Yes	8/2017	Yes Too dark	Yes		Loan Account Screenshot	Registration Sticker	Yes
Yes		Yes	Yes			Yes			Loan Account Screenshot		Yes
Yes	Yes	Yes	Yes			Yes				GAP Agreement	
Yes Eligible Seller	Yes	Yes	Yes			Yes				Buyer's Tag	
		Yes	Yes								
Yes	Yes	Yes	Yes	Yes Terry/Patricia	4/2017	Yes Terry dark	Yes				
Yes	Yes	Yes	Yes	Yes	3/2017	Yes			Simple Finance Charge		Yes
Yes		Yes	Yes	Yes Amber	5/2017	Yes Amber too narrow	Yes	Yes	Loan Account Snapshot		
Yes	Yes	Yes	Yes	Yes Stephen/Kathryn	10/31/2016	Yes Stephen	Yes				
Yes	Yes	Yes	Yes			Yes	Yes				
		Yes	Yes	Yes	5/2017	Yes	Yes	Yes		Inspection	
Yes	Yes	Yes	Yes	Yes	7/31/2017	Yes	Yes	Yes	Simple Finance Charge		
Yes		Yes	Yes	Yes	5/2017	Yes front/back	Yes	Yes	Simple Finance Charge Payoff Receipt	Contract, Odometer Disclosure, Agreement to Provide Insurance	
Yes	Yes buyback	Yes	Yes								
		Yes							Blurry Simple Finance Charge; Loan Account Screenshot		
Yes	Yes	Yes	Yes	Yes	6/30/2017	Yes	Yes				
Yes	Yes	Yes	Yes	Yes Carlos/Candida	7/2017	Yes Carlos			Finance Agreement	Veteran	
	Yes (Email)	Yes	Yes			Yes			Simple Finance Charge		Yes
Yes		Yes	Yes			Yes Rodney	Yes Co-Buyer Susan Fisher				
Yes	Yes	Yes	Yes				Yes Co-Buyer Deanne Fisher	Yes	Simple Finance Charge		
Yes		Yes	Yes			Yes					
Yes	Yes	Yes	Yes	Yes Roberto/Connie	3/2017	Yes Roberto	Cutoff	Yes		Insurance	Yes
Yes	Yes	Yes				Yes	Blurry			Buyer's Tag	Yes
		Yes	Yes	Yes	7/2017	Yes		Blurry	Simple Finance Charge		
Yes	Yes	Yes	Yes			Yes Lori	Yes Co-Buyer Steven Frank		Simple Finance Charge too faint		
Yes	Yes	Yes	Yes	Yes Janet/Kenneth	10/31/2017	Yes Both	Yes				
Yes											
Yes	Yes	Yes	Yes	Yes Victor/Linda	6/2017		Yes			Pledings	
Yes	Yes	Yes	Yes			Yes Both				Tax Collector's Receipt for Title Application (Expired)	
	Yes	Yes	Yes			Yes Both			Simple Finance Charge		
Yes		Yes	Yes				Yes				Yes
		Yes	Yes								
Yes	Yes	Yes	Yes			Yes	Lease Agreement			Police Report from Accident	Yes
		Yes	Yes			Yes	Yes				
Yes	Yes	Yes	Yes			Too dark	Too dark				
Yes	Yes (Email)	Yes	Yes	Yes Christopher/Ramiro/Susan	10/2016	Yes Ramiro	Too Dark	Yes	Simple Finance Charge	Insurance	
Yes	Yes	Yes	Yes						Simple Finance Charge		
	Yes	Yes	Yes			Yes		Yes	Simple Finance Charge	Registration Sticker	
Yes		Yes	Yes							Reprint Contract	
Yes		Yes	Yes			Yes	Yes				
Yes		Yes				Yes Justin	Yes Co-Buyer Anastasia Finlayson		Simple Finance Charge		
	Not Eligible for Eligible Sell	Yes	Yes				Yes				
Yes	Yes	Yes	Yes	Yes	2/2017	Yes	Yes				
		Yes	Yes	Yes	5/2017	Yes			Too Faint Simple Finance Charge	GAP Agreement	
Yes		Yes	Yes	Yes	12/2016	Too Big Try to Resize	Yes	Yes			Yes
Yes		Yes	Yes			Yes	Yes				

CLIENT FOLDERS - Inventory List

Yes	Yes	Yes	Yes	Yes Amy/James	5/31/2017	Yes Both			Marriage License	
	Yes					Yes	Yes		Copy of check for vehicle	
Yes	Yes	Yes	Yes			Yes	Yes	Check Folder	Tax Collector's Receipt for Title Application (Expired)	
Yes		Yes	Yes	Yes Jorge/Enn	8/29/2016	Yes Both		Loan Account Screenshot	Photos of Vehicle	
	Yes	Yes	Yes	Yes Ruben/Ins	7/2017	Yes Both		Finance Agreement	Inspection Reprint Contract	
Yes		Yes	Yes				Yes			
Yes		Yes	Yes				Yes			
		Yes	Yes			Bad Copy	Yes	Yes	Inspection, GAP Waiver Agreement Insurance, Bill of Sale	
Yes		Yes				Too Big Try to Resize	Yes Top Cutoff			
Yes		Yes	Yes				Yes	Yes	Tax Collector's Receipt for Title Application (Expired)	Earle/Mona
		Yes	Yes			Yes	Yes			
		Yes	Yes			Yes Both	Yes	Yes	Tax Collector's Receipt for Title Application (Expired)	Justin/Sarah
Yes	Yes	Yes				Yes		Too Faint Simple Finance Charge		
Yes		Yes					Blurry	Blurry Simple Finance Charge		
		Yes	Yes	Yes Ty/Jamca	7/31/2017	Yes Ty				
Yes Eligible Seller	Yes	Yes	Yes				Yes	Simple Finance Charge	Credit Score, Agreement to Provide Insurance Odometer Disclosure	
Yes	Yes buyback	Yes	Yes	Yes Kimberly/Joshua		Yes Kim	Yes	Yes on PO		
		Yes	Yes	Yes	11/2016	Yes	Yes	Simple Finance Charge		
Yes	Yes Lowmont	Yes								
Yes	Yes buyback	Yes	Yes				Yes			
Yes	Yes	Yes	Yes	Yes	12/2016	Yes	Yes			
Yes	Yes	Yes	Yes	Yes	1/2017	Yes				
Yes	Yes (just I)	Yes	Yes	Yes Robert/Charlotte	8/20/2016	Yes Both		Yes		
Yes		Yes	Yes	Yes Robert/Charlotte/Top Gun Enigma Microbial	3/31/2017	Yes Both	Yes			
Yes	Yes buyback	Yes	Yes	Yes	01/30/17	Yes	Yes	Maint, Rep Tires	Atty fee split consent	
		Yes	Yes	Yes	12/31/2016			Yes		
Yes	Yes	Yes	Yes					Simple Finance Charge		
Yes	Yes	Yes	Yes							
Yes	Yes Eligible Seller	Yes	Yes	Yes	10/2016	Yes		Lease Agreement		
	Yes	Yes	Yes	Yes	8/29/2016	Yes		Loan Account Screenshot	Inspection	
	Yes	Yes	Yes	Yes Michael/Gilbert	4/2017	Yes Both	Yes	Yes	Inspection	
Yes		Yes	Yes	Yes	1/2017	Yes Too Dark	Yes	Yes	Simple Finance Charge	
Yes	Yes buyback	Yes	Yes	Yes	07/31/18	Yes		Maint, Rep Tires	Atty fee split consent	
Yes	Yes	Yes	Yes			Yes	Yes Cutoff Look in folder	Simple Finance Charge Cutoff Look in folder		
Yes	Yes	Yes	Yes	Yes Kristopher/Angela	3/31/2017	Yes Kristopher Too Contrasted				
Yes	Yes written fax	Yes	Yes	Yes Jack/Diana	4/24/2016	Yes Jack	Yes	Yes	Loan Agreement	
	Yes								Contract Only	
Yes		Yes								
Self Reg.	No completing himself	Yes	Yes							
Yes		Yes		Yes	7/31/2017	Yes	Yes	Yes (on PO) & 8/12/16 Acct Statement	Atty fee split consent	
Yes		Yes	Yes	Yes Lisa/George	2/28/2018	Yes Lisa		Yes	Application for Duplicate Title, Order of Sole Trustee, Mother's Death Certificate	
Yes	Yes	Yes	Yes	Yes	3/2017	Yes		Yes	Buyer's Receipt, Insurance Inspection Title Receipt	
	Yes									
Yes	Yes	Yes	Yes	Yes Mike/Guadalupe	12/2016	Yes Mike Temp Permit & DL (Expired)		Loan Account Screenshot & Simple Finance Charge		
									Contract Only	
	Yes	Yes	Yes				Yes			
Yes		Yes	Yes	Yes Michael/Betty	3/31/2017					
Yes		Yes	Yes	Title Application Receipt (looks like registration)	9/2017	Yes	Yes	Lien Payoff Information & Simple Finance Charge		
Yes	Yes	Yes	Yes	Yes	5/2017	Yes	Yes			
No missing info		Yes	Yes	Yes	10/31/2017	Yes Face Too Dark		Yes	Loan Payoff Letter/Receipt	Insurance Card, Odometer Disclosure
	Yes buyback	Yes	Yes	Yes Diane/George (deceased)	02/08/17	Yes Diane	Yes	Maint, Rep	George death cert; Atty fee split consent	
Yes		Yes	Yes	Yes	07/24/17	Yes	Yes	Maint, Rep	Atty fee split consent	
Yes	Yes	Yes	Yes	Registration Renewal Notice & Receipt	11/2016	Yes Side Cutoff	Yes	Simple Finance Charge (Top Cutoff)	Report, Theft Deterrent System, Vehicle Service Contract	
Yes	Yes	Yes	Yes			Yes				
Yes	Yes	Yes	Yes	yes terri/tammy	3/2016	Yes Terri	Yes		insurance	
Yes		Yes	Yes	yes	7/2017	yes	yes	yes	simple finance charge & screenshot	
Yes		yes	yes	yes	5/2016	yes		yes	simple finance charge	
yes	yes	yes		yes	7/2017	yes	yes		info sheet	
Yes		Yes	Yes							
Yes		Yes	Yes							
Yes	Yes buyback	Yes	Yes	Yes The Little Family Trust Dated/Marvin/Nancy	4/30/2017	Yes Both Too Dark	Yes		Simple Finance Charge Too Faint	

CLIENT FOLDERS - Inventory List

Yes	Yes emissions mod	Yes	Yes			Yes	Yes	Yes	Simple Finance Charge	Insurance Card	
Yes	Yes buyback	Yes	Yes	Yes Gary/Krasi	12/31/2016	Yes Gary	Yes	Yes			
Yes	Yes	Yes	Yes	Yes James/Janet	12/31/2016	Yes James	Yes			info sheet, social security	
yes		yes	yes			yes					
yes		yes	yes								
yes		yes	yes	yes	3/2017	yes	yes			social security	
yes	yes	yes	yes	yes-	6/2016						
yes		yes	yes				yes				
yes	yes	yes	yes	yes-renee & claudia	12/2016	Yes Both	yes		simple finance charge		
No Self Reg											
yes	yes	yes	yes			yes	yes		GAP Insurance	info sheet	
yes		yes	yes								
yes	yes email	yes	yes				yes				
Yes	Yes	Yes	Yes			yes-good version in email	Yes		Simple Finance Charge		Yes
Yes	Yes buyback	Yes	Yes			Yes	Yes		Simple Finance Charge		
	Yes	Yes	Yes	Blurry Registration Renewal Receipt	11/2016	Yes (in Lisa's file)		Yes			
Yes	Yes	Yes	Yes	Registration Renewal Receipt	5/2016				Tax Collector's Receipt for Title Application (Expired 6/2014) Buyer's Tag Dealer's Registration Receipt, Insur		
Yes	Yes Eligible Seller	Yes	Yes			Yes	Yes		Total Loss Settlement		
Yes	Yes	Yes	Yes			Yes	Yes		Simple Finance Charge		Yes
Yes Lease Term.		Yes	Yes	Title Application Receipt & Sticker	6/2016	Yes	Yes		Lease Agreement		
		Yes	Yes						Insurance		
Yes	Yes	Yes	Yes	Yes	11/2016	Yes	Yes		Insurance Tax Collector's Receipt for Title/Registration (Expired 11/2014) Inspection		
Yes		Yes	Yes						Atty fee split consent		
	Yes	Yes	Yes	Registration Renewal Receipt	6/2017	Yes	Yes		Simple Finance Charge (Cutoff)		Yes
Yes	Yes buyback	Yes	Yes			Yes Hubert	Yes Co-Buyer Jennifer Hare				
	Yes										
		Yes	Yes	Registration Renewal Receipt & Sticker Brian/William	6/2017	Yes Both	Yes		Simple Finance Charge	Insurance Claim Summary (Collision)	
Yes		Yes	Yes	Registration Renewal Receipt & Sticker	7/2017	Yes	Yes	Yes	Simple Finance Charge	Trade-In Motor Vehicle, Inspection, Photo of Sticker Odometer Disclosure	
Yes	Yes buyback	Yes	Yes			Yes	Yes		Simple Finance Charge		
Yes		Yes	Yes	Yes David/Jacob	3/2017	Yes Jacob	Yes	Yes			
Yes		Yes	Yes	Registration Renewal Receipt & Sticker	5/2017	Passport	Yes		Loan Account Snapshot, Simple Finance Charge, Insurance, Odometer Disclosure, Warranty Arbitr		Yes
Yes	Yes buyback	Yes	Yes	Yes	07/31/17	Yes	Yes	Maunt, Rep	Yes		Yes
Yes	N/A Seller										
Yes	Yes	Yes	Yes				Yes				
Yes	Yes	Yes	Yes			Yes	Yes		Yes	Atty fee split consent	
		Yes	Yes			Yes Paul	Yes Co-Buyer Lynda Murray				
Yes	N/A Seller										
Yes	Yes buyback	Yes	Yes				Yes Co-Buyer Kimberly Naylor		Simple Finance Charge		
Yes	Yes buyback	Yes	Yes	Yes Jeffrey Nee/Stephanie Telesco (Top Cutoff)	12/31/2016	Yes Jeffrey	Yes Co-Buyer Stephanie Telesco	Yes	Simple Finance Charge	Insurance Card	
Yes	Yes buyback	Yes	Yes	Yes	5/31/2017	Yes	Yes		Simple Finance Charge		
Yes		Yes	Yes	Registration Renewal Receipt	11/2016	Yes	Yes	Yes	Simple Finance Charge (3rd page cutoff)	Inspection Report	
No 3.0 Vehicle		Yes				Yes	Yes				Yes
Yes	Yes	Yes	Yes	Registration Renewal Receipt & Sticker	6/2017	Yes	Yes		Simple Finance Charge	Odometer Disclosure, Agreement to Provide Insurance	
Yes	Yes	Yes	Yes	Registration Renewal Receipt	5/2017	Yes		Yes	Loan Agreement/Consumer Credit Transaction	Insurance	
Yes		Yes	Yes			Yes			Simple Finance Charge	Service Contract, GAP Insurance Odometer Disclosure	
Yes		Yes	Yes			Yes Expired	Yes			Photo of Sticker Buyer's Tag Receipt	
Yes	Yes	Yes	Yes	Registration Renewal Receipt	3/2017	Yes				Tax Collector's Receipt for Title (Expired 3/2015)	
No Missing info		Yes									
Yes	Yes	Yes	Yes					Yes		Insurance	
Yes	Yes buyback	Yes	Yes			Yes-Both Too Dark	Yes Co-Buyer Gregory Peterson				
	Yes-emissions mod	Yes	Yes	Yes	6/2016	Yes	Yes	Maunt, Rep		Atty fee split consent	
Yes		Yes	Yes				Yes Co-Buyer Kelley Phillips		n/a		
Yes		Yes	Yes	Registration Renewal Receipt & Sticker With maiden name	2/2017	Yes with maiden name Pier	Yes (Robert Paul)	Yes	Simple Finance Charge (Robert Paul)	Inspection, Marriage Certificate to Eric Smith	Yes
Yes	Yes	Yes	Yes			Yes	Yes	Yes	Simple Finance Charge	Photo of Stickers Inspection Report	Yes
Yes	Yes	Yes	Yes			Yes with maiden name Pier	Yes (Robert Paul)	Yes	Simple Finance Charge (Robert Paul)	Inspection Report, Marriage Certificate to Daniel Matthe	Yes
No 3.0 Vehicle		Yes		Registration Renewal Receipt	1/2017	Yes	Yes	Yes		Inspection Report, Protection Plan	Yes
Yes	Yes	Yes		Yes	1/2017	Yes	Yes				
Yes	Yes	Yes	Yes	Yes	2/28/2017	Yes Too Dark	Yes	Yes			
	Yes buyback (Email)	Yes	Yes			Yes	Yes				
Yes	Yes buyback	Yes	Yes	Renewal notice only		Yes	Yes		Yes		
		Yes	Yes			Yes Corrine Too Dark/Cutoff	Yes Cutoff Co-Buyer Richard Rago				
Yes	Yes buyback	Yes	Yes				Yes				

CLIENT FOLDERS - Inventory List

		Yes				Yes Both	Yes Co-Buyer Miguel Ramirez				
Yes		Yes					Yes				
Yes	Yes buyback	Yes	Yes			Yes	Yes		Yes		
Yes	Yes buyback	Yes	Yes	Yes	5/31/17	Yes	Yes need better copy				
Yes	Yes buyback	Yes	Yes	Yes	3/2017	Yes	Yes		Yes		
Yes	Yes emissions mod	Yes	Yes			Yes	Yes		Yes		
		Yes				Yes	Yes				
No missing info		Yes				Yes	Yes				
Yes	Yes buyback	Yes	Yes	Renewal notice only		Yes	Yes				
No missing info		Yes	Yes	Yes		Yes both	Yes				
Yes		Yes	Yes			Partial (check for better copy)	Yes		Yes		
	Yes emissions mod	Yes	Yes			Yes	Yes				
No 30 Vehicle		Yes	Yes	Yes	10/31/2016	Yes Too Dark	Yes	Yes	N/A		
yes		yes	Yes								
	Yes buyback	Yes	Yes								
yes	Yes buyback	yes	yes	yes	12/2016	yes		yes			
yes		yes	yes	yes		yes			simple finance charge	social security	
yes	yes- buyback										
yes	yes- buyback	yes	yes	yes	Jan 2017	yes	yes		screenshot	social security	
yes						yes			request better copy		
	Yes										
	yes- buyback	yes	yes	yes	May 2017			yes	simple finance charge		
		yes	yes			yes	yes leased				
	yes- buyback										
yes		yes	yes	yes		yes	yes				
yes	Yes	yes	yes	yes joe/dinajoe	2/2017	yes	yes		yes		
yes	yes-emissions mod	yes	yes	yes-thomas/maria	5/2016	yes-thomas/maria		yes	simple finance charge		
yes	yes-eligible seller	yes	yes	yes	3/2017	yes		yes	inspection/simple finance charge/info sheet		
Yes	Yes buyback	Yes		Yes Louis/Kayla	04/30/17	Yes Louis	Yes	Maint	Yes		
yes	yes-buyback	yes	yes			yes			simple finance charge		
		Yes	Yes				Yes				
yes		yes									
No missing info		Yes				Yes	Yes				
	Yes undecided										
Yes	Yes buyback	Yes	Yes			Yes	Yes		Yes		
Yes	Yes-emissions mod	Yes	Yes			Yes	Yes		Yes		
	Yes emissions mod	Yes	Yes			Yes	Yes		Yes		
No missing info		Yes	Yes								
Yes		Yes	Yes	Yes	3/31/17	Yes	Yes				
Yes	Yes buyback	Yes	Yes	Yes Rhonda/Jim	05/31/18	Yes Rhonda	Yes				
Yes		Yes	Yes	Yes	03/31/17	Yes	Yes				
Yes Seller	Yes	Yes	Yes	Yes	01/31/17	Yes	Yes				
Yes	Yes buyback	Yes		Yes Russ/Hivra	01/15/17	Yes both	Yes may need bigger copy	Yes-may need bigger copy 3/2/16 Acct statement			
Yes		Yes	Yes	Yes Nancy/Kory	03/31/17	Yes both	Yes	Maint Rep	Yes	Atty fee split consent	
	Yes buyback										
Yes	Yes buyback	Yes	Yes								
Yes		Yes	Yes	Yes Frank/Elizabeth	10/31/16	Yes Elizabeth	Yes	Rep	Yes		
Yes	Yes buyback	Yes	Yes	Yes		Front Illegible	Yes	Maint	Yes		
No missing info											
Yes	Yes emissions mod (email)	Yes	Yes			Yes	Yes	Rep			
Yes	Yes buyback	Yes	Yes			Yes			Yes		
Yes	Yes buyback	Yes	Yes	Yes Shane/Kym			Yes		Yes		
	Yes emissions mod										
Yes	No lawsuit	Yes	Yes			Yes	Yes		N/A pd cnsh		
Yes	Yes buyback	Yes	Yes	Yes		Yes	Yes	Rep	Yes		
No Self Reg											
Yes	Yes buyback	Yes	Yes	Yes	05/31/17	Yes	Yes	Maint	Yes		
Yes	Yes buyback	Yes	Yes	Yes	04/30/17	Yes (pic not legible)	Yes	Maint, Rep	Yes & 5/6/16 payoff quote from VW		
Yes		Yes	Yes	Yes Cori/Marc		Yes Matt/Marc (bars too dark)	Yes	Maint, Rep			
Yes		Yes	Yes	Yes	09/30/17	Yes both			Yes		
Yes	Yes unsure	Yes	Yes			Yes	Yes		Yes		
Yes		Yes	Yes								
Yes	Yes buyback	Yes	Yes			Yes	Yes		Yes		

EXHIBIT

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VEHICLE INFORMATION SHEET - Master List

[illegible]

Color	Director	Spanner Only	CAMILLE PORTAL LOGIN	Vehicle Make/Model	Vehicle Year	Location/Dealership	Price	Purchase Date	Amount Owed	Finance Company	Current Mileage	Loan Account	Purchase Price	Vehicle	Notes	
			returned pocket	2013	Jetta TDI Sedan 4D	Mottn Bessier in Louisiana	LA	\$31,558.86	9/1/2013	\$16,263.47	vw credit			purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00	7/1/2013		Wells Fargo	41,043		purchase	yes	new
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			returned pocket	2013	Jetta TDI Sedan 4D	Stacy VW CO	CA	\$22,800.00								

[illegible]

[illegible]

CLIENT COMMUNICATION: - Contact By Email - English

REFERRED BY:	LAST NAME	FIRST NAME	EMAIL	PHONE #
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXX@XXXXXXXXXXXXX	XXX-XXX-XXXX

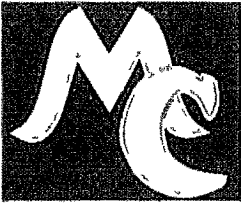


CLIENT COMMUNICATION: - Contact By Email - Spanish

REFERRED BY:	LAST NAME	FIRST NAME	EMAIL	PHONE #
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXX@XXXXXXXXXXXXX	XXX-XXX-XXXX

REFERRED BY:	LAST NAME:	FIRST NAME:	ADDRESS:	PHONE #
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XX	XXX-XXX-XXXX

REFERRED BY:	LAST NAME:	FIRST NAME:	ADDRESS:	PHONE #:
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	XX	XXX-XXX-XXXX



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO•
pcampolo@maloneyandcampolo.com

DATE:

CM/RRR:

Volkswagen Group of America Inc.
Corporation Service Company, DBA
CSC-Lawyers Inc., Services Corporation Registered Agent
211 East 7th Street Ste., 620
Austin, Texas 78701-3210

RE: NAME; VEHICLE Purchased on DATE;
Notice of Claims; Violations of Deceptive Trade Practices-Consumer Protection Act

To whom it may concern:

I represent client NAME, who has retained me to assert a claim against you for violations of the Texas Deceptive Trade Practices Act, ("DTPA"), Texas Business & Commerce Code section 17.41 et seq. This letter is notice of my client's claim and attempt to resolve the matter without litigation. If this claim is covered by an insurance policy, please forward this letter to your insurance carrier to ensure that the carrier receives timely notice of the claim and will provide you with representation and coverage.

FACTUAL HISTORY

This claim arose from your engagement in false, misleading, and deceptive acts or practices that my client relied on to HIS/HER detriment; your breach of both express and implied warranties; and your unconscionable action or course of action that took advantage of my client's lack of understanding, knowledge, ability, experience, or capacity to a grossly unfair degree.

On DATE, our client NAME purchased a VEHICLE from PURCHASE PLACE for the price of \$PRICE.

VIN #



BASIS FOR RECOVERY

Based upon public information, your representatives knowingly and intentionally installed defeat devices in order to market and sell automobiles as having greater fuel efficiency and performance than actuality. Moreover, you sold the vehicle to my client knowing that the vehicle did not comply with EPA emissions regulations. Furthermore, if the vehicles were designed and manufactured to comply with such emissions regulations, they would not have the fuel efficiency and performance characteristics that you marketed and represented them to have.

Specifically, you and/or your representatives committed a number of false, misleading and deceptive acts and practices, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46. These “laundry list” violations include, but are not limited to, the following acts or practices:

1. Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods and services, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(2);
2. Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities which they do not have, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(5);
3. Representing that goods or services are of a particular standard, quality, or grade if they are of another, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(7);
4. Advertising goods or services with the intent not to sell them as advertised, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(9);
5. Representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(12);
6. Representing that a guarantee or warranty confers or involves rights or remedies which it does not have or involve, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(20); and
7. Failing to disclose information concerning goods or services which was known at the time of the transaction and such failure to disclose such information was intended to induce the consumer into a transaction to which the consumer would not have entered had the information been disclosed, in violation of TEXAS BUSINESS & COMMERCE CODE §17.46(b)(24).

The representations, acts, and omissions made by you in your dealings with my client constituted an “unconscionable action or course of action” as such term is defined by Section 17.45(5), TEXAS BUSINESS & COMMERCE CODE.

In addition to the forgoing laundry list violations, you also breached express and implied warranties, in violation of TEXAS BUSINESS & COMMERCE CODE §17.50(a)(2). Specifically, you breached the New Vehicle Limited Warranty, Federal Emissions Control System Defect Warranty, and Federal Emissions Performance Warranty. You also breached the implied warranty of merchantability.

Despite the existence of these warranties, you failed to inform my client that my client’s vehicle had been intentionally and knowingly designed and manufactured to be out of compliance with all applicable federal and state clean air standards and by failing to fix the defective emissions components free of charge.

RELIEF REQUESTED

Because of your violations of the DTPA, my client has incurred economic damages of \$PRICE. These damages represent the diminution in value as a result of the misrepresentations, omissions, and defects described above. In the event of litigation, these amounts will be adjusted upward to reflect any additional damages.

In the event of litigation, my client will also seek recovery of mental-anguish damages in the amount of \$PRICE X3 and trebled economic damages on the grounds that your conduct was committed knowingly.

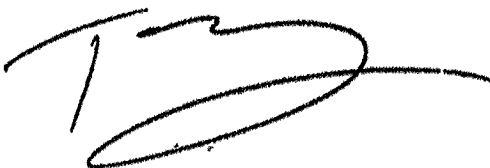
In addition, because your conduct was intentional, my client will seek recovery of trebled mental-anguish damages.

At this time, my client has incurred attorney fees in the amount of \$5,000 and other related expenses in the amount of \$1,000. In the event of litigation, these amounts will be adjusted upward to reflect any additional damages.

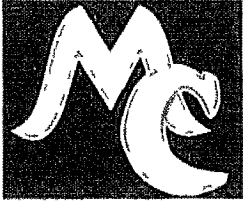
My client wishes to resolve this matter without filing suit. Therefore, we request that you remit payment in the amount of \$TOTAL. This sum includes my client's economic damages, mental anguish damages, attorney fees, and expenses. If this sum is not paid within 60 days of receipt of this notice, suit will be filed against you.

I look forward to hearing from you soon.

Sincerely,

A handwritten signature in black ink, appearing to be 'Tim Maloney', with a stylized, flowing script.

Tim Maloney



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*

tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO•

pcampolo@maloneyandcampolo.com

FECHA:

CM/RRR:

Volkswagen Group of America Inc.
Empresa servicio de Corporación, DBA
CSC abogados Inc., Corporación de servicios de agente registrado
211 East 7th Street ste, 620
Austin, Texas 78701-3210

RE: Nombre; VEHÍCULO comprado en fecha de;

Notificación de reclamaciones; Violaciones de la ley de protección de consumidor de prácticas engañosas de comercio

A quien pueda interesar:

Represento a cliente nombre, que ha conservado para afirmar una reclamación contra usted por violaciones a la ley de prácticas comerciales engañosas Texas, ("DTPA"), Texas negocios & comercio código sección 17.41 et seq. Esta carta es un aviso de reclamo de mi cliente y tratar de resolver el asunto sin litigio. Si este reclamo está cubierto por una póliza de seguro, por favor envíe esta carta a su aseguradora para asegurar que el portador reciba aviso oportuno de la demanda y le proporcionará cobertura y representación.

HISTORIA FÁCTICA

Esta afirmación surge de su participación en la falsa, engañosa y actos engañosos o prácticas que mi cliente se basó en su perjuicio; el incumplimiento de las garantías expresas e implícitas; y su desmesurada acción o curso de acción que se aprovecharon de la falta de mi cliente de comprensión, conocimiento, habilidad, experiencia o capacidad en un grado extremadamente injusto.

En la fecha, nuestros clientes Nombre adquirió un vehículo del lugar de compra por el precio de \$PRICE.

VIN #

BASE PARA LA RECUPERACIÓN

Basado en información pública, sus representantes a sabiendas e intencionalmente instalan dispositivos de derrota con el fin de comercializar y vender automóviles por tener una mayor eficiencia de combustible y el rendimiento de la actualidad. Por otra parte, usted vende el vehículo a mi cliente sabiendo que el vehículo no cumplía con las normas de emisiones de EPA. Además, si los vehículos fueron diseñados y fabricados para cumplir con tales regulaciones de emisiones, no tendría las características de rendimiento y eficiencia de combustible que se comercializa y el que tengan.

Específicamente, usted o sus representantes cometieron una serie de falsa, engañosa y engañosa actos y prácticas en violación de CÓDIGO DE COMERCIO Y NEGOCIOS DE TEXAS § 17.46. estas violaciones de la "lista de lavandería" incluyen, pero no se limitan a, los siguientes actos o prácticas:

1. Que causan confusión o malentendido en cuanto a la fuente, patrocinio, aprobación o certificación de bienes y servicios, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(2);
2. Que representa que productos o servicios tienen patrocinio, aprobación, características, ingredientes, usos, beneficios, o cualidades que no tienen, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(5);
3. Que representa que productos o servicios son de un estándar particular, calidad o grado si son de otro, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(7);
4. Publicidad bienes o servicios con la intención de no venderlos como se anuncia, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(9);
5. Que representa que un acuerdo confiere o implica derechos, remedios u obligaciones que no tienen ni implican, o que están prohibidos por la ley, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(12);
6. Que representa que una garantía o garantía confiere o implica derechos o remedios que no tienen ni implican, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(20); y
7. Su defecto a revelar información relativa a productos o servicios que era conocido en el momento de la transacción y tal falta de divulgar tal información fue pensada para inducir al consumidor en una transacción a la que el consumidor no habría entrado tenía la información divulgada, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.46(b)(24).

Las representaciones, actos y omisiones hechas por usted en el trato con mi cliente constituyó una "acción intolerable o curso de acción" como dicho término se define por la sección 17.45(5), CÓDIGO DE COMERCIO Y NEGOCIOS DE TEXAS.

Además de las violaciones de esta lista, usted también había violado garantías expresas e implícitas, en violación de la TEXAS BUSINESS & CÓDIGO DE COMERCIO §17.50(a)(2). Específicamente, se infringió la garantía limitada para vehículos nuevos, garantía de defecto de sistema de Control de emisiones federales y Federal garantía de rendimiento de las emisiones. También se infringió la garantía implícita de comerciabilidad.

A pesar de la existencia de estas garantías, usted no pudo informar a mi cliente que vehículo de mi cliente había sido intencionalmente y conscientemente diseñado y fabricado para estar fuera de cumplimiento con

todos los estándares de aire limpio federal y estatal aplicable y al no fijar los componentes de emisiones defectuoso gratuitamente.

AYUDA SOLICITADA

Debido a sus violaciones de la DTPA, mi cliente ha incurrido en daños económicos de \$PRICE. Estos daños representan la disminución en el valor como resultado de los defectos descritos anteriormente, tergiversaciones y omisiones. En caso de litigio, estas cantidades se ajustará hacia arriba para reflejar cualquier daño adicional.

En caso de litigio, mi cliente también buscará recuperación de daños de angustia mental por la cantidad de \$PRICE X3 y triplicados daños económicos debido a que su conducta se cometió a sabiendas.

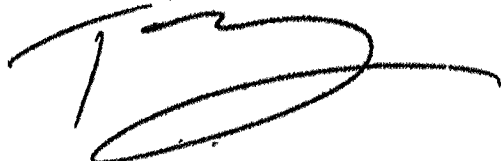
Además, debido a que su conducta fue intencional, mi cliente buscan recuperación de daños triplicados de angustia mental.

En este momento, mi cliente ha incurrido en honorarios por un monto de \$5.000 y otros gastos por un monto de \$1.000. En caso de litigio, estas cantidades se ajustará hacia arriba para reflejar cualquier daño adicional.

Mi cliente quiere resolver este asunto sin presentar la demanda. Por lo tanto, solicitamos que usted remite el pago por la cantidad de \$TOTAL. Esta suma incluye daños económicos, daños de angustia mental, honorarios y gastos de mi cliente. Si esta suma no se paga dentro de 60 días de la recepción de esta notificación, demanda será presentada contra usted.

Espero oír de usted pronto.

Atentamente,

A handwritten signature in black ink, appearing to be 'Tim Maloney', with a large, stylized loop at the end.

Tim Maloney

USPS TRACKING #



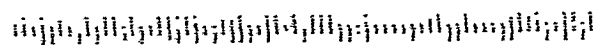
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 1358 5285 1773 54

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box®

REC JAN 05 2016 MALONE	LAW OFFICES OF MALONEY & CAMPOLO 926 S. Alamo San Antonio, Texas 78205
------------------------------	--



DTA / S / Rieke

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Volkswagen Group of America Inc.
 Corporation Service Company, DBA
 CSC-Lawyers Inc., Services Corporation Registered
 Agent
 211 East 7th Street Ste., 620
 Austin, Texas 78701-3210



9590 9402 1358 5285 1773 54

2. Article Number (Transfer from service label)

7015 1730 0000 0968 6627

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☒ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
DEC 28 2015

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below. ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input checked="" type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Mail Restricted Delivery (00) | |

Domestic Return Receipt

Volkswagen Demand/DTPA Letters - Status

Volkswagen DTPA Letters

Name	Batch	Notified by	Sent Copy	Date Sent	Volkswagen Demand/Letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/28/2015	Not received yet
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	1	email	YES	12/29/2015	yes-sent copy&letter
	2	email	YES	12/28/2015	yes-sent copy&letter
	2	email	YES	12/28/2015	yes-sent copy&letter
	2	email	YES	1/8/2016	yes-sent copy&letter
	2	email	YES	12/29/2015	yes-sent copy&letter
	2	email	YES	12/29/2015	yes-sent copy&letter
	2	email	YES	12/29/2015	yes-sent copy&letter
	2	email	YES	12/29/2015	yes-sent copy&letter
	2	email	YES	12/29/2015	yes-sent copy&letter
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	4	mail	yes	12/29/2015	yes-sent copy&letter
	4	mail	yes	12/29/2015	yes-sent copy&letter
	4	email	YES	12/29/2015	yes-sent
	4	email	YES	12/29/2015	yes-sent

EXHIBIT

9

Volkswagen Demand/DTPA Letters - Status

4	email	YES	12/29/2015	yes-sent copy&letter
4	mail	yes	12/29/2015	yes-sent copy&letter
4	email	YES	12/29/2015	yes-sent copy&letter
5	mail	yes	12/29/2015	yes-sent copy&letter
5	email	YES	12/28/2015	yes-sent copy&letter
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5	mail	yes	12/28/2015	yes-sent copy&letter
5	email	YES	12/29/2015	yes-sent copy&letter
5	mail	yes	12/29/2015	yes-sent copy&letter
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5	email	YES	12/29/2015	yes-sent copy&letter
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7	email	YES	12/29/2015	yes-sent copy&letter
7	email	YES	12/29/2015	yes-sent copy&letter
7	mail	YES	12/29/2015	yes-INCORRECT ADDRESS
7	email	YES	12/28/2015	yes-sent copy&letter
7	email	YES	12/29/2015	yes-sent copy&letter
8	mail	YES	12/31/2015	yes-INCORRECT ADDRESS
8	mail	yes 01/14/2016	12/31/2015	yes-sent copy&letter
8	email	YES	12/31/2015	yes-sent copy&letter
8	mail	yes 01/14/2016	12/31/2015	yes-sent copy&letter
8	email	YES	1/8/2016	yes-sent copy&letter

Volkswagen Demand/DTPA Letters - Status

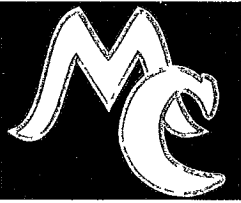
9		re-scan docum	1/6/2016	yes-sent copy& letter
9	mail	yes 01/14/2016	1/7/2016	yes-sent copy& letter
9	email	yes	1/7/2016	yes-sent copy& letter
9	email	yes	1/7/2016	yes-sent copy& letter
9	email	yes	1/7/2016	yes-sent copy& letter
9	email	yes	1/7/2016	yes-sent copy& letter
9	email	yes	1/7/2016	yes-sent copy& letter
9	email	yes	1/6/2016	yes-sent copy& letter
9	mail	YES	1/6/2016	yes-sent copy& letter
9	email	yes	1/7/2016	not received yet
9	email	yes	1/7/2016	yes-sent copy& letter
10	email	yes	1/8/2016	yes-sent copy& letter
10	email	yes	1/8/2016	yes-sent copy& letter
10	email	yes	1/8/2016	yes-sent copy& letter
10	email	yes	1/8/2016	yes-sent copy& letter
11	email	yes	1/15/2016	yes-sent copy& letter
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11	email	yes	1/15/2016	yes-sent copy& letter
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11	email	yes	1/15/2016	yes-sent copy& letter
11	email	yes	1/15/2016	yes-sent copy& letter
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12	email	yes	1/21/2016	yes-sent copy & letter
12	mail	yes	1/21/2016	yes-sent copy & letter
12	email	yes	1/21/2016	yes-sent copy & letter
12	email	yes	1/21/2016	yes-sent copy & letter
12	email	yes	1/21/2016	yes-sent copy & letter
12	email	yes	1/21/2016	yes-sent copy & letter
12	email	yes	1/21/2016	yes-sent copy & letter
13	email	yes	1/23/2016	yes-sent copy & letter

Volkswagen Demand/DTPA Letters - Status

13	email	yes	1/23/2016	yes-sent copy & letter
13	email	yes	1/23/2016	yes-sent copy & letter
13	email	yes	1/23/2016	yes-sent copy & letter
13	email	yes	1/23/2016	yes-sent copy & letter
13	email	yes	1/23/2016	yes-sent copy & letter
13	email	yes	1/23/2016	not received yet
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14	email	yes	1/29/2016	yes-sent copy & letter
14	email	yes	1/29/2016	yes-sent copy & letter
14	email	yes	1/29/2016	yes-sent copy & letter
14	email	yes	1/29/2016	not received yet
14	email	yes	1/29/2016	yes-sent copy & letter
14	email	yes	1/29/2016	yes-sent copy & letter
14	email	yes	1/29/2016	yes-sent copy & letter
15	email	yes	2/4/2016	YES-sent copy & letter
15	email	yes	2/6/2016	YES-sent copy & letter
15	email	yes	2/4/2016	YES-sent copy & letter
15	mail		2/4/2016	YES
15	email	yes	2/4/2016	YES-sent copy & letter
15	email	yes	2/6/2016	not received yet
15	email	yes	2/4/2016	YES-sent copy & letter
15	email	yes	2/4/2016	YES-sent copy & letter
16	email	yes	2/10/2016	YES-sent copy & letter
16	email	yes	2/12/2016	not received yet
16	email	yes	2/10/2016	YES-sent copy & letter
16	email	yes	2/10/2016	YES-sent copy & letter
16	email	yes	2/10/2016	YES-sent copy & letter
16	email	yes	2/10/2016	YES-sent copy & letter
16	email	yes	2/10/2016	not received yet
17	email	yes	IN TRANSIT	yes
17	mail	yes	2/18/2016	
17	email	yes	2/18/2016	
17	email	yes	2/18/2016	
17	email	yes	2/23/2016	yes
18		yes	2/24/2016	YES-sent copy & letter
18		yes	2/24/2016	YES-sent copy & letter

Volkswagen Demand/DTPA Letters - Status

18	mail		2/24/2016	
19	email	yes	3/10/2016	
19	mail	yes	3/10/2016	
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19	email	yes	3/10/2016	
19	mail	yes	3/10/2016	
19	email	yes	3/10/2016	
19	email	yes	3/10/2016	
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20	email	yes	3/30/2016	
22	email			
22	email		5/4/2016	
22	email	yes	5/4/2016	
22	mail			
22	email	yes	5/4/2016	
22	email	yes	5/4/2016	
22	email	yes	5/4/2016	
22	email	yes	5/4/2016	
22	email	yes		
23			5/26/2016	
23			5/31/2016	
23			6/3/2016	
23	email		6/8/2016	
23	email		6/13/2016	
23			6/15/2016	
23	mail		6/15/2016	
23	email		6/17/2016	
23	email		6/22/2016	



**LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.**

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

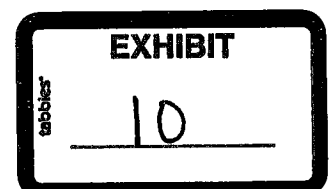
The first step in filing your lawsuit is preparing a DTPA (Deceptive Trade Practices Act) demand letter. This letter is a written notice to Volkswagen which allows them the opportunity to make you an offer on your vehicle to avoid our firm filing a lawsuit against them. The deadline for response is 60 days. Thus far, Volkswagen has not made any offers to any clients. This is understandable due to the high volume of cases being filed against them.

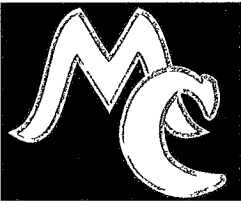
Recently, Volkswagen has sent us response letters to the demands. I will send you a copy of yours when I receive it. In the meantime, here is a copy of your demand letter. We will plan on going forward with the lawsuit unless Volkswagen decides to make you an offer – at that point it will be up to you if you would like to accept it.

On 4-21-2016, the Federal Court in the Northern District of California, held a hearing regarding settling the Volkswagen claims. Though progress has been made, there are many important details that are still being worked out. Regardless of what you may have heard in the media, there has been NO firm agreement.

The next hearing date is June 21, 2016. At that time the parties are supposed to present details about the settlement. We are in constant contact with all attorneys involved in these discussions and we will know for certain what VW is offering and we will of course notify immediately.

Again, Volkswagen has agreed to settle. However, what they are ultimately offered, may, or may not, be acceptable. We are closely monitoring all developments. Please do not rely upon media reports and assume these studies are accurate. Confidential negotiations are ongoing. We will keep you informed.





**LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.**

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

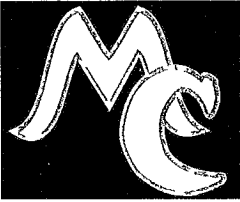
DATE

NAME

The first step in filing your lawsuit is preparing a DTPA demand letter (Deceptive Trade Practices Act) This letter is a written notice to Volkswagen which allows them the opportunity to make you an offer on your vehicle to prevent filing a lawsuit against them The deadline for response is 60 days So far, Volkswagen has not made any offers to customers This is understandable due to the high volume of cases being filed against them

On June 21, 2016, the Federal Court of the Northern District of California, held a hearing with respect to settle complaints from Volkswagen. Although it has advanced, there are many important details still being worked out We are in constant contact with the lawyers involved in these discussions and it will be known with certainty what VW's final offer will be and at that time we will of course notify you immediately





**LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.**

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

FECHA

NOMBRE

El primer paso en la presentación de su demanda se está preparando una carta de demanda DTPA (Ley de prácticas comerciales engañosas). Esta carta es una notificación por escrito a Volkswagen que les permite la oportunidad de hacer una oferta en su vehículo para evitar la presentación de una demanda contra ellos. El plazo de respuesta es de 60 días. Hasta el momento, Volkswagen no ha hecho ninguna oferta a los clientes. Esto es comprensible debido al alto volumen de casos que se presenten en contra de ellos.

El 21 de abril de 2016, la Corte Federal del Distrito Norte de California, tuvo una audiencia con respecto a resolver las quejas de Volkswagen. Aunque se ha avanzado, hay muchos detalles importantes todavía en curso de preparación. Independientemente de lo que usted puede haber oído en los medios de comunicación, no ha habido un acuerdo firme. La próxima fecha de la audiencia fue el 21 de junio de, el año 2016, donde VW anunció sus ideas preliminares para los asentamientos de clase. Estamos en constante contacto con los abogados involucrados en estas discusiones y que se sepa con certeza lo que la oferta final de VW será y en ese momento vamos a por supuesto que le notifique inmediatamente.



Fogle Law Firm, PLLC
10001 Reunion Place, Ste. 600
San Antonio, Texas 78216
210-503-6736
sfogle@foglelawfirm.com

January 20, 2016

Via Certified Mail/R.R.R.
7011 0470 0000 0272 7112
Tim Maloney
Maloney and Campolo, L.L.P.
926 S. Alamo
San Antonio, Texas 78205

Re: Response to

Demand Letter dated December 22, 2015

Dear Mr. Maloney:

On behalf of Volkswagen of America, Inc. ("Volkswagen"), an organizational unit of Volkswagen Group of America, Inc., this letter acknowledges receipt and responds to your letter dated December 22, 2015 regarding your client's vehicle and their emissions-related concerns.

As an initial matter, please note that on September 18, 2015, the United States Environmental Protection Agency (EPA) stated "[c]ar owners should know that although these vehicles have emissions exceeding standards, these violations do not present a safety hazard and the cars remain legal to drive and resell. Owners of cars of these models and years do not need to take any action at this time."

In response to your specific demand, while Volkswagen disagrees with your legal assertions, the Company values your client as a customer. In that spirit, we appreciate the opportunity to discuss this matter informally before you resort to the use of the Courts, and we are optimistic that this dispute can be efficiently resolved.

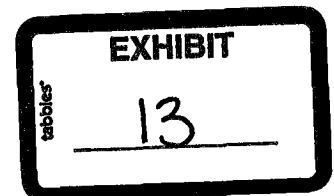
To that end, Volkswagen hereby offers to rectify, within a reasonable time, any emissions irregularities in your client's vehicle that are the subject of the EPA's September 18, 2015 Notice of Violation. Once this remedy is available, we will contact you to arrange an appointment at an authorized Volkswagen dealer that is most convenient for your client.

Very truly yours,


Stephen R. Fogle

/gc

{03733012 DOCX / }



VOLKSWAGEN

GROUP OF AMERICA

May 24, 2016

Mr. Tim Maloney
Law Offices of Maloney & Campolo, LLP
926 S. Alamo
San Antonio, TX 78205

Volkswagen Group of America
3800 Hamlin Rd
Auburn Hills MI 48326
Telephone 844 862 8942
Fax +1 248 754 6504

Customer Name:

RE: 2015 Volkswagen Passat
Case: 160486347
VIN: 1VW8V7A33FC060337

Dear Mr. Maloney,

This letter is in response to your correspondence regarding the above-mentioned vehicle. We regret the circumstances that prompted your client's concerns and your correspondence. Please note that we are in the process of carefully evaluating your request; we have not yet made a decision regarding the repurchase you have demanded.

To ensure we have all necessary information, and to permit us to further respond and advise you of our decision in a timely manner, we ask that you send us:

- copy of the purchase/lease agreement for the vehicle
- copy of the vehicle's most recent registration
- copies of all repair orders pertaining to the vehicle (from authorized Volkswagen facilities, as well as any independent repair facilities).

We will review those materials upon receipt and get back to you promptly with our decision.

Please mail the information to my attention at the address above or fax the information to (248) 754-6504.

Sincerely,



Laura I.
Customer Resolution & Retention



TRANSACTION REPORT

JUL/05/2016/TUE 09:27 AM

FAX (TX)

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
0	JUL/05	09:19AM	2487546504	0:07:14	9	MEMORY OK	ECM 7260

LAW OFFICES OF
MALONEY & CAMPOLOFACSIMILE TRANSMITTAL SHEET

DATE: July 5, 2016

TO: Laura I.
Customer Resolution & Retention
Volkswagen Group of AmericaFacsimile: (248) 754-6504

FROM: Tim Maloney

RE:
CASE #: 160627018
VIN#: WVWDM7AJ5EWO03650

PAGES INCLUDING COVER SHEET: 9

MESSAGE: Please see attached.

The document accompanying this facsimile transmission contains confidential information that is legally privileged. The information is intended solely for the use of the recipient named above. If you receive this transmission in error, please notify us by telephone immediately to arrange for the return of the document to our office. You are notified that any disclosures, reproduction or distribution for the taking of any action in reliance on the contents of this facsimile information is strictly prohibited. Thank you for your cooperation.

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Camille Furgeson

(210)922-2200.

EXHIBIT

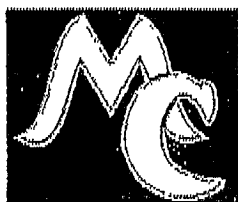
tabbies
15

TRANSACTION REPORT

JUN/30/2016/THU 11:43 AM

FAX (TX)

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
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**LAW OFFICES OF
MALONEY & CAMPOLO**
FACSIMILE TRANSMITTAL SHEET

DATE: 6/30/2016

**TO: LAURA L.
(CUSTOMER RETENTION & RESOLUTION)**

FROM: CAMILLE FURGESON

RE: Our Client:

Pages including cover sheet: 8

**Message: Please see attached documents which you have
requested for our client.**

Facsimile: 248 754 6504

The document accompanying this facsimile transmission contains confidential information that is legally privileged. The information is intended solely for the use of the recipient named above. If you receive this transmission in error, please notify us by telephone immediately to arrange for the return of the document to our office. You are notified that any disclosures, reproduction or distribution for the taking of any action in reliance on the contents of this facsimile information is strictly prohibited. Thank you for your cooperation.

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TRANSACTION REPORT

JUN/30/2016/THU 11:17 AM

FAX (TX)

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
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**LAW OFFICES OF
MALONEY & CAMPOLO**
FACSIMILE TRANSMITTAL SHEET

DATE: 6/30/2016**TO: MICHELE P.
(CUSTOMER RETENTION & RESOLUTION)****FROM: CAMILLE FURGESON****RE: Our Client:****Pages including cover sheet: 8****Message: Please see attached documents which you have
requested for our client.****Facsimile: 248 754 6504**

The document accompanying this facsimile transmission contains confidential information that is legally privileged. The information is intended solely for the use of the recipient named above. If you receive this transmission in error, please notify us by telephone immediately to arrange for the return of the document to our office. You are notified that any disclosures, reproduction or distribution for the taking of any action in reliance on the contents of this facsimile information is strictly prohibited. Thank you for your cooperation.

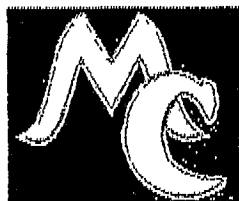
If you do not receive the above mentioned pages, or if you have any trouble with the transmission, please call (210) 922-2200.

TRANSACTION REPORT

JUN/30/2016/THU 11:29 AM

FAX (TX)

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0	JUN/30	11:24AM	12487546504	0:05:17	11	MEMORY OK	ECM 7208



**LAW OFFICES OF
MALONEY & CAMPOLO**
FACSIMILE TRANSMITTAL SHEET

DATE: 6/30/2016

TO: LAURA L.
(CUSTOMER RETENTION & RESOLUTION)

FROM: CAMILLE FURGESON

RE: Our Client:

Pages including cover sheet: 11

Message: Please see attached documents which you have
requested for our client.

Facsimile: 248 754 6504

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If you do not receive the above mentioned pages, or if you have any trouble with the transmission, please call (210) 922-2200.

TRANSACTION REPORT

JUN/30/2016/THU 11:24 AM

FAX(TX)

DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
JUN/30	11:18AM	12487546504	0:05:14	12	MEMORY OK	ECM 7207



**LAW OFFICES OF
MALONEY & CAMPOLO**
FACSIMILE TRANSMITTAL SHEET

DATE: 6/30/2016

**TO: LAURA L.
(CUSTOMER RETENTION & RESOLUTION)**

FROM: CAMILLE FURGESON

RE: Our Client:

Pages including cover sheet: 12

**Message: Please see attached documents which you have
requested for our client.**

Facsimile: 248 754 6504

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If you do not receive the above mentioned pages, or if you have any trouble with the transmission, please call (210) 922-2200.

VOLKSWAGEN VEHICLE QUESTIONNAIRE

(YOUR NAME:

VEHICLE MAKE/MODEL/YEAR:

1. Do you still own your vehicle (vehicles)?

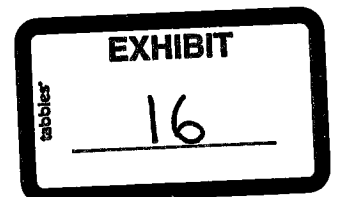
2. If yes, what is the condition of your vehicle?

*Leased *Totaled *Good Condition *Other (please explain)

(3. If no, under what circumstance did you get rid of your vehicle?

4. Have you been in any accidents? Please explain.

Please provide detailed information regarding the current condition of your vehicle.



CUESTIONARIO DE VEHÍCULO VOLKSWAGEN

(Te llamas:

MARCA/MODELO/AÑO DEL VEHÍCULO:

1. ¿Aún tienes el vehículo (vehículos)?

2. en caso afirmativo, ¿cuál es la situación de su vehículo?

* Alquilado * Totaled * buen estado * otros (sírvese explicar)

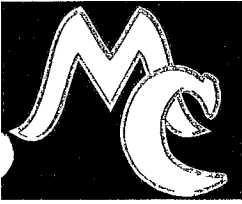
3. Si no, bajo qué circunstancia deshacerse de su vehículo?

(

4. ¿ Ha tenido usted algún accidente? Por favor explique.

Proporcione información detallada sobre la condición actual de su vehículo.

(



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

Date:

Name:

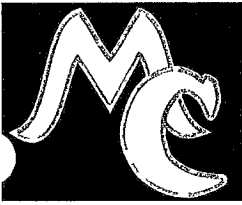
As you know, Mr. Maloney attended the Volkswagen court hearing in Austin, TX on Friday, April 1st. At the meeting, it was established that both VW and the court wants to move these lawsuits as quickly as possible. At the moment, the investigation is ongoing. Volkswagen is providing extensive documentation regarding the emissions scandal.

I have attached a copy of the scheduling order which will be filed with the court regarding your lawsuit. These are the deadlines and plans for future actions. Mr. Maloney wants to assure you that this process has been moving very quickly. We have done all of the research on our end to represent you and we will move forward with full force to obtain the maximum amount of compensation.

We will continue to provide you with any and all updates on your case. Thank you for your patience.

(
Camille Furgeson
Administrative Assistant
cfurgeson@maloneyandcampolo.com





LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

Fecha:

Nombre:

Como usted sabe, Sr. Maloney asistió a la audiencia de Volkswagen en Austin, TX el viernes 1 de abril. En la reunión, se estableció que tanto VW como la corte quiere mover estos pleitos tan rápidamente como sea posible. Por el momento, la investigación está en curso. Volkswagen ofrece amplia documentación sobre el escándalo de las emisiones. He adjuntado una copia de la orden de programación que se presentó ante la corte con respecto a su demanda. Estos son los plazos y planes para acciones futuras. El Sr. Maloney quiere asegurarles que este proceso ha estado moviendo muy rápidamente. Hemos hecho toda la investigación en el extremo para que lo represente y se moverá hacia adelante con toda su fuerza para obtener la cantidad máxima de compensación. Vamos a seguir con cualquier y todas las actualizaciones en su caso. Gracias por su paciencia.

Camille Furgeson
Administrative Assistant
cfurgeson@maloneyandcampolo.com

MASTER CAUSE D-1-GN-16-000370
(MDL 15-0884)

IN RE: VOLKSWAGEN CLEAN DIESEL
LITIGATION

§
§
§
§
§

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

353RD JUDICIAL DISTRICT

SCHEDULING ORDER

The Court finds that, in order to expedite the orderly completion of pretrial preparation, a scheduling and procedural order should be made imposing deadlines for pretrial matters. The Court hereby orders and adopts the following schedule for pretrial proceedings in the Texas Clean Air Act Enforcement Case MDL:

1. April 15, 2016

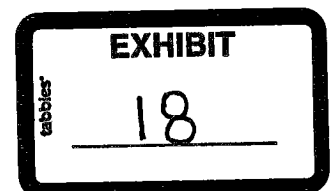
US Document Production.

Subject to the entry of a protective order by the District Court of Travis County, Texas, Defendants' deadline to produce all documents previously produced to United States governmental agencies or regulatory bodies and/or in the Federal MDL. In the event Defendants produce documents after this date to United States governmental agencies or regulatory bodies and/or in the Federal MDL, Defendants will produce those same documents to the Plaintiffs in this litigation, no later than 7 days after such documents are produced in the Federal MDL. The parties are ordered to confer as to an agreed protective order and submit an agreed order to the Court by this deadline. In the event the parties do not agree as to a protective order, the parties shall submit their respective versions of a proposed protective order to the Court by this deadline, in which case the documents required to be produced by this deadline shall be due no later than 7 days after the Court enters a protective order.

2. June 30, 2016

Non-US Document Production.

Subject to the entry of a protective order by the District Court of Travis County, Defendants' deadline to produce all documents previously produced to all non-United States governmental agencies and regulatory bodies, together with any privilege log related to these documents. Any documents produced to non-US governmental agencies or regulatory bodies after this date, will be produced to Plaintiffs in this litigation, no later than 7 days after such documents are produced in the Federal MDL. The parties are



ordered to confer as to an agreed protective order and submit an agreed order to the Court by this deadline. In the event the parties do not agree as to a protective order, the parties shall submit their respective versions of a proposed protective order to the Court by this deadline, in which case the documents required to be produced by this deadline shall be due no later than 7 days after the Court enters a protective order.

- 3. April 29, 2016** **Response to State's Plea to Jurisdiction and Motion to Strike.**
Any responses to the State's Pleas to the Jurisdiction and Motions to Strike shall be filed and served by this date.
- 4. May 13, 2016** **Replies to State's Plea to Jurisdiction and Motion to Strike.**
Any replies to responses the State's Pleas to the Jurisdiction and Motions to Strike shall be filed and served by this date.
- 5. November 1, 2016** **Amended Pleadings or Joinder of Parties.**
All amended pleadings, including joinder of parties, shall be filed or served by this date. Any responsive pleading necessary must be filed within 20 days of this deadline.
- 6. January 31, 2017** **Fact Discovery.**
All fact discovery shall be completed by this date. Parties must serve discovery in sufficient time to allow for a timely response to be served by the other party under the Texas Rules of Civil Procedure no later than this deadline. Incomplete discovery will not delay the trial date or other deadlines established in this Order. Plaintiffs and Defendants may each serve up to 60 Interrogatories in this litigation per party, excluding interrogatories asking a party only to identify or authenticate specified documents.
- 7. February 28, 2017** **Expert Disclosure.**
Plaintiffs shall designate all expert witnesses and provide reports by this date. The designation must include information required by Rule 194.2(f) of the Texas Rules of Civil Procedure.
- 8. March 24 , 2017** **Expert Disclosure.**
Defendants shall designate all expert witnesses and provide reports by this date. The designation must include information required by Rule 194.2(f) of the Texas Rules of Civil Procedure.

9. **April 21, 2017** **Rebuttal Experts.**
The parties shall designate all expert rebuttal witnesses and provide rebuttal reports by this date. The designation must include information required by Rule 194.2(f) of the Texas Rules of Civil Procedure.
10. **May 1, 2017** **ADR.**
Alternative Dispute Resolution (ADR) shall be completed by this date.
11. **June 16, 2017** **Expert Discovery.**
All expert discovery shall be completed by this date.
12. **July 14, 2017** **Daubert and Dispositive Motions.**
All Daubert challenges and witness challenges and all dispositive motions, including Motions for Summary Judgment, shall be set and heard at by this date.
13. **August 1, 2017** **Remand.**
Cases shall be remanded to their originating trial courts by this date.

(Except as expressly provided herein, this Scheduling Order does not alter or amend the standing or subsequent pre-trial order(s) of the originating trial court.

The Court finds that this Scheduling Order should be GRANTED.

Signed this _____ day of _____ 2016.

HONORABLE TIM SULAK

APPROVED BY:

COUNSEL FOR THE STATE OF TEXAS

(_____
LEAD COUNSEL FOR TCAA COUNTY PLAINTIFFS

COUNSEL FOR VOLKSWAGEN/AUDI DEFENDANTS

COUNSEL FOR PORCHE DEFENDANTS

CAUSA DE MASTER D-1-GN-16-000370

(MDL 15-0884)

EN RE: VOLKSWAGEN LIMPIAR § DE DIESEL EN EL TRIBUNAL DE DISTRITO DE

§ DE LITIGIOS

§ EL CONDADO DE TRAVIS, TEXAS

§

DISTRITO JUDICIAL 353ER §

ORDEN DE PROGRAMACIÓN

La Corte considera que, con el fin de agilizar la terminación ordenada de preparación previos al juicio, una orden de programación y de procedimiento debe hacerse imponer plazos para asuntos previos al juicio. El Tribunal por el presente ordena y adopta el siguiente calendario para los procedimientos previos al juicio en el Texas limpio aire ley de aplicación caso MDL:

1. 15 de abril de 2016 Estados Unidos documento producción.

Sujeto a la entrada de una orden de protección por el Tribunal de distrito de Travis County, Texas, plazo demandados para producir todos los documentos producidos previamente a agencias gubernamentales de Estados Unidos u organismos regulatorios o en la Federal MDL. En caso de que los acusados producen documentos después de esta fecha a agencias gubernamentales de Estados Unidos u organismos regulatorios o en la Federal MDL, acusados producirá los mismos documentos a la parte actora en este pleito, no más tarde de 7 días después de que dichos documentos se producen en el MDL Federal. Las partes se ordenan a conferir a una orden de protección acordada y entregar una orden acordada de la corte de este plazo. En caso de que las partes no está de acuerdo en cuanto a una orden de protección, las partes presentarán sus respectivas versiones de una orden de protección propuesta a la corte por este plazo, en cuyo caso los documentos requeridos para ser producido por este plazo deberá ser debido a más tardar 7 días después de que la corte entra en una orden de protección.

2. 30 de junio de 2016 Estados Unidos documento producción.

Sujeta a la entrada de una orden de protección por la corte de distrito del Condado de Travis, fecha límite de los acusados para producir todos los documentos producidos previamente a todas las agencias gubernamentales no estadounidenses y los organismos reguladores, junto con cualquier registro de privilegio relacionado con estos documentos. Cualesquiera documentos presentados a las agencias gubernamentales no estadounidenses o cuerpos reguladores después de esta fecha, se producirán a la parte demandante en este litigio, no más tarde de 7 días después de que dichos documentos se producen en el MDL Federal. Las partes son

ordenó a conferir a una orden de protección acordada y entregar una orden acordada de la corte de este plazo. En caso de que las partes no está de acuerdo en cuanto a una orden de protección, las partes presentarán sus respectivas versiones de una orden de protección propuesta a la corte por este plazo, en cuyo caso los documentos requeridos para ser producido por este plazo deberá ser debido a más tardar 7 días después de que la corte entra en una orden de protección.

3., 29 de abril de 2016 ante súplica del estado a la jurisdicción y el movimiento de huelga.

Las respuestas a las súplicas del estado a la jurisdicción y movimientos de huelga serán presentadas y servidas por esta fecha.

4. respuestas de, 13 de mayo de 2016 a la súplica del estado a la jurisdicción y el movimiento de huelga.

Ninguno responde a respuestas presentados y servidos por esta fecha Declinatoria el estado de la competencia y movimientos de huelga.

5., 1 de noviembre de 2016 modificada alegatos o acumulación de partes.

Todos modificados alegatos, incluyendo acumulación de partes, será presentado o servido por esta fecha. Cualquier respuesta declararse necesaria debe ser presentada dentro de 20 días de plazo.

6. descubrimiento del hecho de, 31 de enero de 2017.

Todo descubrimiento de hecho se completará antes de esta fecha. Partes deben servir de descubrimiento con la suficiente antelación para permitir una respuesta oportuna al otro parte bajo del Texas reglas de Procedimiento Civil no más tarde de esta fecha límite. Descubrimiento incompleto no retrasará la fecha del juicio u otros plazos establecidos en esta orden. Los demandantes y los acusados cada uno sirva interrogatorios hasta 60 en este litigio por partido, excluyendo interrogatorios pidiendo un partido sólo para identificar o autenticar documentos especificados.

7. divulgación de expertos de, 28 de febrero de 2017.

Los demandantes deberán designar a los peritos y proporcionar informes por esta fecha. La designación deberá incluir la información requerida por la regla 194.2(f) de las reglas de Procedimiento Civil de Texas.

8. divulgación de expertos, 24 de marzo de 2017.

Los acusados deberán designar a los peritos y proporcionar informes por esta fecha. La designación deberá incluir la información requerida por la regla 194.2(f) de las reglas de Procedimiento Civil de Texas.

9. expertos de la refutación del, 21 de abril de 2017.

Las partes designar a todos los testigos expertos refutación y proporcionar informes de refutación por esta fecha. La designación deberá incluir la información requerida por la regla 194.2(f) de las reglas de Procedimiento Civil de Texas.

10., 1 de mayo de 2017 ADR.

Alternativa resolución de disputa (ADR) se completará antes de esta fecha.

11 descubrimiento de expertos de, 16 de junio de 2017.

Todos descubrimientos expertos se completarán antes de esta fecha.

12. 14 de julio de 2017 Daubert y mociones dispositivas.

Todos los desafíos Daubert y desafíos del testigo y todos los movimientos dispositivos, incluidos movimientos para Resumen sentencia, deberán establecer y escuchados en esta fecha.

13. prisión preventiva, 1 de agosto de 2017.

Casos deberán ser remitidos a sus tribunales de origen por esta fecha.

Salvo lo dispuesto expresamente en este documento, esta orden de programación no alterar o enmendar el pie o posteriores pedidos previa al juicio del Tribunal originario.

El Tribunal considera que debe concederse esta orden de programación.

Firmado el día ____ de ____ 2016.

HONORABLE TIM SULAK

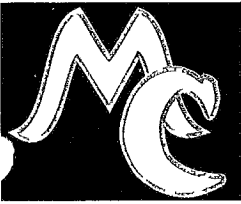
APROBADO POR:

ABOGADO PARA EL ESTADO DE TEXAS

ABOGADO PARA DEMANDANTES DE TCAA CONDADO PRINCIPAL

ACUSADOS DE ABOGADO PARA VOLKSWAGEN/AUDI

ACUSADOS DE ABOGADO PARA PORCHE



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

April 25, 2016

Dear _____

On 4-21-2016, the Federal Court in the Northern District of California, held a hearing regarding settling the Volkswagen claims. Though progress has been made, there are many important details that are still being worked out. Regardless of what you may have heard in the media, there has been NO firm agreement.

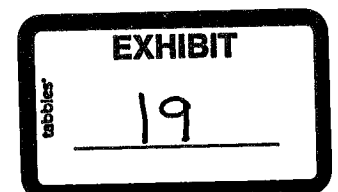
The next hearing date is June 21, 2016. At that time the parties are supposed to present details about the settlement. We are in constant contact with all attorneys involved in these discussions and we know for certain what VW is offering, we will of course notify immediately.

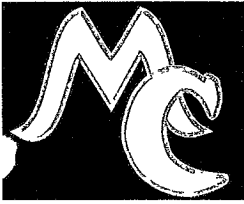
Again, Volkswagen has agreed to settle. However, what they are ultimately offered, may, or may not, be acceptable. We are closely monitoring all developments. Please do not rely upon media reports and assume these studies are accurate. Confidential negotiations are ongoing. We will keep you informed.

Camille Furgeson

ADMINISTRATIVE ASSISTANT

The Law Offices of Maloney and Campolo
926 South Alamo
San Antonio, TX 78205
Office (210) 922-2200
Fax (210) 923-1313
Email cfurgeson@maloneyandcampolo.com





LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

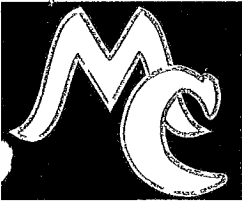
TIM MALONEY*
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PAUL E. CAMPOLO*
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El 21/04/2016, el Tribunal Federal del distrito norte de California, celebró una audiencia con respecto a resolver las reclamaciones de Volkswagen. Aunque se ha avanzado, hay muchos detalles importantes que todavía se están elaborando. Independientemente de lo que puede haber oído en los medios de comunicación, no se ha producido ningún acuerdo firme.

La próxima fecha de audiencia es 21 de junio de 2016. En aquel momento las partes deben presentar información sobre el establecimiento. Estamos en constante contacto con los abogados involucrados en estas discusiones y sabemos con certeza lo que VW ofrece, por supuesto te avisaremos inmediatamente.

Una vez más, Volkswagen ha acordado resolver. Sin embargo, lo que se ofrecieron en última instancia, pueden o no pueden ser aceptable. Estamos monitoreando de cerca todas las novedades. Por favor no confiar en los medios de comunicación y asumir que estos estudios son exactos. Negociaciones confidenciales están en curso. Te mantendremos informado.



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

Date:

Name:

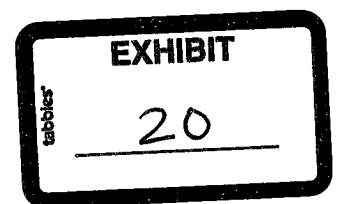
Last night the court notified our Attorney that Volkswagen has been given an extension for the June 21st court hearing regarding the details of their buy back proposals. Volkswagen was granted a 7-day extension to prepare their offers. Please be advised that we will not know any further information until June 28th. It is not necessary for you to contact our office, we will notify you of the offer shortly after it becomes available to us. Please understand that it may take several days to contact you in order for us to fully evaluate Volkswagen's offer as it pertains to your case.

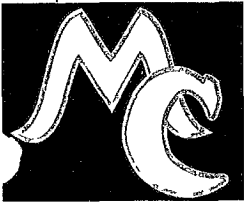
Thank you for your understanding,

Camille Furgeson

Administrative Assistant

cfurgeson@maloneyandcampolo.com





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OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
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PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

Fecha:

Nombre:

Ayer por la noche el Tribunal notificó a nuestro abogado que Volkswagen se ha dado una extensión para junio 21' st audiencia en la corte con respecto a los detalles de sus propuestas de compra posterior. Volkswagen se concedió una extensión de 7-días para preparar sus ofertas. Tenga en cuenta que no se sabe más información hasta el 28 de junio. No es necesario que contacte con nuestra oficina, le informaremos de la oferta poco después de que disponemos. Por favor, comprenda que puede tomar varios días para contactarte en orden para poder evaluar plenamente la oferta de Volkswagen lo que respecta a su caso.

Gracias por su comprensión,

Camille Furgeson

Administrative Assistant

cfurgeson@maloneyandcampolo.com

Volkswagen Reaches Preliminary Approval for Class Action Settlements

June 28, 2016

Volkswagen AG announced today that it has reached a preliminary approval for the buyback proposals on the 2.0 TDI diesel engine vehicles. At the moment, we are currently working through 500 pages of certified court documents which lay out the details for the settlements. Please allow us some time to review the offer and decipher how it will pertain to your specific case.

I know you are anxious to hear what their offer might entail. To give you an idea, Volkswagen will be offering vehicle buybacks, lease terminations, and emissions modifications (if approved). The buyback offers will be based on the NADA clean trade in value published in the September 2015 used car guide. There will also be cash payments on top of the trade in value. The lease terminations will allow lessees an early termination of the lease without penalty and an added cash payment. We have provided a chart (below) to help give you an idea of what your offer might look like.

It has come to our attention that Volkswagen sent some of you an email this morning with a link to <https://www.vwcourtsettlement.com>. You are welcome to visit the website and stay updated on the content they provide; however, we would like to remind you that all emails, phone calls, and attempts at communication need to be directed to your attorney, Tim Maloney.

Negotiations are still being worked out for all 3.0 TDI vehicles. There has been no information available to the public or the court yet.

Please be advised that the agreements covering the proposed 2.0L TDI settlements are subject to change. We have provided a timeline (below) which lists the important upcoming court dates. The motion for final approval is set for August 26, 2016. You will have the option of accepting Volkswagen's offer or opting out and moving forward with your lawsuit. Our mission is to make sure you are treated fairly and are happy with your outcome.

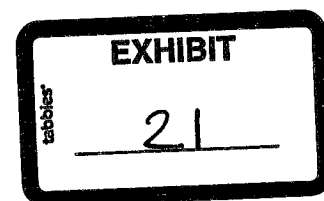
As stated, we are currently working through over 500 pages of court documents to review the fine details of how their offer will pertain to you. We will keep you updated on the case and as soon as we have more details and information we will notify you immediately.

Thank you,

Camille Furgeson

ADMINISTRATIVE ASSISTANT

The Law Offices of Maloney and Campolo
926 South Alamo
San Antonio TX 78205
Office (210) 922-2200
Fax (210) 923-1313



Category	Definition	Benefit Options	Restitution Payment
Eligible Owner (bought car on or before September 18, 2015)	Registered owner of an Eligible Vehicle at the time of Buyback or Approved Emissions Modification.	(1) <u>Buyback</u> Vehicle Value + Restitution Payment + Loan Forgiveness if applicable OR (if approved) (2) <u>Emissions Modification</u> Modification to your car to reduce emissions + Restitution Payment	20% of the Vehicle Value + \$2,986.73 \$5,100 minimum
Eligible Owner (bought car after September 18, 2015)	Registered owner of an Eligible Vehicle at the time of Buyback or Approved Emissions Modification.	(1) <u>Buyback</u> Vehicle Value + Restitution Payment OR (if approved) (2) <u>Emissions Modification</u> Modification to your car to reduce emissions + Restitution Payment	10% of the Vehicle Value + \$1529 + a proportional share of any restitution not claimed by Eligible Sellers \$2,550 minimum
Eligible Seller	Registered owner of an Eligible Vehicle on September 18, 2015, who transferred vehicle title after September 18, 2015, but before June 28, 2016.	Restitution Payment	10% of the Vehicle Value + \$1,493.365 \$2,550 minimum
Eligible Lessee (currently leases car)	Registered lessee of an Eligible Vehicle, with a lease issued by VW Credit, Inc., at the time of Early Lease Termination or Approved Emissions Modification.	(1) <u>Lease Termination</u> Early termination of the lease without penalty + Restitution Payment OR (if approved) (2) <u>Emissions Modification</u> Modification to your car to reduce emissions + Restitution Payment	10% of the Vehicle Value (adjusted for options but not mileage) + \$1529
Eligible Lessee (formerly leased car)	Registered lessee of an Eligible Vehicle, with a lease issued by VW Credit, Inc., who returned the Eligible Vehicle at the end of the lease on or after September 18, 2015, or purchased the Eligible Vehicle after June 28, 2016.	Restitution Payment	10% of the Vehicle Value (adjusted for options but not mileage) + \$1,529

Date	Event
June 28, 2016	Settlement Class Representatives file Motion for Preliminary Approval of Settlement
June 30, 2016	Status Conference with the Court
July 5, 2016	Volkswagen provides Class Action Fairness Act Notice to State Attorneys General
July 26, 2016	Preliminary Approval Hearing [Remainder of schedule assumes entry of Preliminary Approval Order on this date]
July 27, 2016	Class Notice Program begins
August 19, 2016	Class Notice Program ends
August 26, 2016	Motion for Final Approval filed
September 16, 2016	Objection and Opt-Out Deadline
September 16, 2016	End of Eligible Seller Identification Period
September 29, 2016	Deadline for State Attorneys General to file Comments/Objections to this Class Action Agreement
September 30, 2016	Reply Memorandum in Support of Final Approval filed



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01 de julio de 2016

Volkswagen alcanza una aprobación preliminar para los establecimientos de la acción de clase

Volkswagen AG anunció el 28 de junio de 2016 que ha alcanzado una aprobación preliminar para las readquisiciones de acciones propuestas en los vehículos de motor diésel TDI 2,0. Por el momento, actualmente trabajamos a través de 500 páginas de documentos de la corte certificada que ponen los detalles de los asentamientos. Por favor Permítanos un tiempo revisar la oferta y descifrar cómo se refieren a su caso específico

Sé que está ansioso de oír lo que podría conllevar su oferta. Para darte una idea, Volkswagen ofrecerá vehículo recompras, terminaciones de contrato de arrendamiento y modificaciones de emisiones (si aprueba). Las ofertas de recompra se basará en el comercio limpio NADA de valor publicado en la guía de coches usados de septiembre de 2015. También habrá pagos en efectivo sobre el comercio en valor. Las terminaciones de contrato de arrendamiento permitirán a los arrendatarios una terminación anticipada del contrato sin penalización y un pago adicional. Hemos incluido un gráfico (abajo) para ayudar a darle una idea de lo que parece tu oferta.

Ha llegado a nuestra atención que Volkswagen algunos de ustedes un correo electrónico enviado esta mañana con un enlace a <https://www.vwcourtsettlement.com>. Usted es Bienvenido a visite el sitio web y Mantente actualizado sobre el contenido que proporcionan; sin embargo, nos gustaría recordarles que todos los correos electrónicos, llamadas telefónicas e intentos de comunicación deban ser dirigidas a su abogado, Tim Maloney.

Las negociaciones todavía se están elaborando para todos los vehículos TDI 3,0. No ha habido ninguna información disponible para el público o el Tribunal todavía.

Tenga en cuenta que los acuerdos relativos a los asentamientos de TDI de 2,0 L propuestos están sujetas a cambios. Hemos incluido una línea de tiempo (abajo) que muestra las fechas de corte próxima importante. La moción para la aprobación final está programada para el 26 de agosto de 2016. Usted tendrá la opción de aceptar la oferta de Volkswagen o declinar y hacia adelante con su demanda. Nuestra misión es asegurarnos de que reciben un trato justo y esté satisfecho con su resultado.

Como se dijo, estamos trabajando a través de más de 500 páginas de documentos de la corte para revisar los detalles de cómo sus ofertas le pertenecen a usted. Te mantendremos actualizado sobre el caso y tan pronto como tenemos más detalles e información se le notificará inmediatamente.

CATEGORÍA	DEFINICIÓN	OPCIONES DE BENEFICIO	PAGO DE RESTITUCIÓN
Derecho propietario (Comprado coche en o antes del 18 de septiembre de 2015)	Propietario registrado de un vehículo elegible en el momento de la recompra de acciones o la modificación de emisiones aprobado	<p>1 recompra Valor de vehículo, pago de restitución + préstamo perdona (si corresponde)</p> <p>O (si aprobó)</p> <p>2 modificación de emisiones Modificación a su coche para reducir las emisiones de + pago de restitución</p>	<p>20% del valor del vehículo + \$2.986,73</p> <p>mínimo de \$5.100</p>
Derecho propietario (Coche comprada después del 18 de septiembre de 2015)	Propietario registrado de un vehículo elegible en el momento de la recompra de acciones o la modificación de emisiones aprobado	<p>1 recompra Valor vehículo + pago de restitución</p> <p>O (si aprobó)</p> <p>2 modificación de emisiones Modificación a su coche para reducir las emisiones de + pago de restitución</p>	<p>10% del valor del vehículo \$1 529 + una participación proporcional de cualquier restitución no reclamado por los vendedores</p> <p>mínimo de \$2.550</p>
Vendedor elegible	Propietario registrado de un vehículo elegible en 18 de septiembre de 2015, quien transfirió vehículo título después de 18 de septiembre de 2015, pero antes de 28 de junio de 2016	Pago de restitución	<p>10% del valor del vehículo + \$1.493,36</p> <p>mínimo de \$2.550</p>
Arrendatario derecho (actualmente arrienda el coche)	Registrado arrendatario de un vehículo elegible, con un contrato de arrendamiento expedida por VW Crédito, Inc., en el momento de la terminación anticipada del contrato de arrendamiento o aprobado la modificación de emisiones	<p>1 terminación de contrato de arrendamiento de Terminación anticipada del contrato de arrendamiento sin pena + restitución pago</p> <p>O (si aprobó)</p> <p>2 modificación de emisiones Modificación a su coche para reducir las emisiones de + pago de restitución</p>	<p>10% del valor del vehículo (ajustado por opciones, pero no kilometraje) + \$1.529</p>
Arrendatario derecho (anteriormente alquilado coche)	Registro de arrendatario de un vehículo elegible, con un contrato de arrendamiento por VW Crédito, Inc., que regresó el vehículo elegible al final del contrato de arrendamiento en o después 18 de septiembre de 2015, o comprado el vehículo elegible después de 28 de junio de 2016	Pago de restitución	<p>10% del valor del vehículo (ajustado por opciones, pero no kilometraje) + \$1.529</p>

FECHA	EVENTO
28 DE JUNIO DE 2016	Representantes de la clase de establecimiento solicitar movimiento de aprobación preliminar del establecimiento
30 DE JUNIO DE 2016	Conferencia de estado ante el Tribunal
05 DE JULIO DE 2016	VW ofrece acción justicia ley de notificación a los abogados del estado general
26 DE JULIO DE 2016	Audiencia de aprobación preliminar
27 DE JULIO DE 2016	Comienza el programa de aviso de clase
19 DE AGOSTO DE 2016	Clase aviso programa termina
26 DE AGOSTO DE 2016	Propuesta de aprobación definitiva presentada
16 DE SEPTIEMBRE DE 2016	Objeción y optar por un plazo
16 DE SEPTIEMBRE DE 2016	Final del período de identificación del vendedor elegibles
29 DE SEPTIEMBRE DE 2016	Fecha límite para el general de abogado del estado a presentar comentarios/objeciones a este acuerdo de demanda colectiva
30 DE SEPTIEMBRE DE 2016	Memorándum de respuesta en apoyo a aprobación final presentado

Volkswagen Update: July 21, 2016

On July 26, 2016 we will be attending the court hearing with Judge Charles Breyer and Volkswagen Group of America. At this hearing the parties will discuss granting preliminary approval of Volkswagen's proposed settlements. If the judge grants preliminary approval, notice will be mailed to you announcing the specific terms of the settlements. You will also learn about your rights to exclude yourself from their offer and you will be provided the opportunity to object or comment on the proposed settlement. Currently the settlement proposal only applies to 2.0 diesel vehicles. We anticipate receiving VW's proposed settlement offer for the 3.0 vehicles in the near future. We will notify all 3.0 vehicle owners as soon as we receive any and all information.

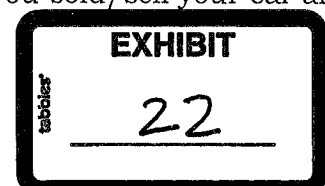
On Tuesday, July 26, 2016, we hope to get more answers regarding the details for attorney's fees, buybacks, and the timing for this process. This should all be addressed at the hearing and we will provide these answers for you as soon as we receive them. I have attached a copy of Volkswagen's Executive Summary of Proposed Class Settlement. Keep in mind that this is not yet finalized by the court and may change. There will be a 30-day time period for the court to review the proposal and listen to the objections and comments of vehicle owners after the hearing. It is possible that on July 26, 2016 you will be able to enter your VIN on VW's website to see an estimate of the range of compensation you might receive through the class action settlement. Please be advised that if you purchased your vehicle used or sold your vehicle between September 18, 2015 and June 28, 2016, your settlement offer may be reduced if the previous (or current) owner submits a claim on the same vehicle.

As you may know, Volkswagen will be using the September 18, 2015 NADA clean vehicle trade in value to construct your buyback offer. We have begun research on our end to ensure your offer is accurate. Unfortunately, we have to wait until we get a finalized formula to determine the offer amount. Although you may have previously provided us with the details regarding your vehicle, we need to update your file so we can give you the most accurate estimate as to what your buyback offer might be.

Please verify the following information:

1. Do you owe anything on your vehicle? If so how much?
2. Which company is financing your vehicle?
3. What is the current mileage on your vehicle?
4. Did you purchase or lease your vehicle?
5. Do you still own your vehicle?
- If not, what was the date that you sold it, traded it in, or totaled it? (please explain which scenario applies to you)
6. Did you purchase your vehicle used? If so, when?
7. Are you the only person listed on the title of your vehicle? If not, please list the additional names and whether they are included in your claim.

It is very important that you answer **ALL** the questions completely and accurately. Please send all answers together in one email, fax or mailed letter. Please be advised if you sold/sell your car after June 28, 2016 you will not be an eligible seller or an eligible owner.



Actualización Volkswagen: 21 de julio de 2016

En 26 de julio de 2016 estaremos presentes en la audiencia con el juez Charles Breyer y el grupo Volkswagen de América. En esta audiencia las partes analizarán otorgar aprobación preliminar de los asentamientos propuestos de Volkswagen. Si el juez concede aprobación preliminar, se enviará aviso a usted anunciando los términos específicos de los establecimientos. También aprenderá acerca de sus derechos a excluirse de su oferta y le dará la oportunidad a objeto o comentario sobre la solución propuesta. Actualmente la propuesta de solución sólo se aplica a los vehículos diésel 2,0. Esperamos recibir oferta de arreglo propuesto de VW para los 3,0 vehículos en el futuro cercano. Se les notificará a todos los propietarios de vehículos 3.0 tan pronto como recibimos toda información.

En martes, 26 de julio de 2016, esperamos conseguir más respuestas acerca de los detalles para honorarios de abogados, recompras y el calendario para este proceso. Todo esto debe dirigirse a la audiencia y nosotros le proveeremos estas respuestas para usted tan pronto como recibamos. He adjuntado una copia del Ejecutivo Resumen de propuesta clase establecimiento de Volkswagen. Tenga en cuenta que esto aún no está finalizado por el Tribunal y puede cambiar. Habrá un plazo de 30 días para la corte a examinar la propuesta y escuchar las objeciones y comentarios de los propietarios de vehículos después de la audiencia. Es posible que en 26 de julio de 2016 usted podrá ingresar su VIN en la Web de VW a ver una estimación del rango de compensación que puede recibir a través de la acción de clase del establecimiento. Tenga en cuenta que, si usted compró su vehículo usado o vendido su vehículo entre el 18 de septiembre de 2015 y 28 de junio de 2016, su oferta podrá reducirse si el dueño anterior (o actual) presenta una reclamación en el mismo vehículo.

Como ustedes saben, Volkswagen va a utilizar el 18 de septiembre de 2015 NADA limpiar el vehículo comercial en valor a construir su oferta de recompra de acciones. Hemos comenzado investigaciones en nuestro extremo para asegurar que su oferta sea exacta. Por desgracia, tenemos que esperar hasta que tengamos una fórmula definitiva para determinar el monto de la oferta. Aunque usted puede previamente nos ha proporcionado los detalles con respecto a su vehículo, tenemos que actualizar su archivo para que podamos dar la estimación más precisa en cuanto a lo que podría ser la oferta de recompra de acciones.

Por favor verifique la siguiente información:

1. no debes nada en su vehículo? ¿Si hasta cuánto?

2. ¿Qué empresa es la financiación de su vehículo?

3. ¿Cuál es el kilometraje actual de su vehículo?

4. ¿comprar o arrendar su vehículo?

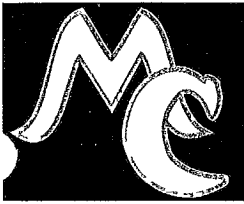
5. ¿aún tienes el vehículo?

-Si no, ¿cuál fue la fecha que lo vendió, comercializados en, o lo sumaron a? (por favor explique qué situación se aplica a usted)

6. ¿compró su vehículo usado? ¿Si es así, cuando?

7. eres la única persona que aparece en el título de su vehículo? Si no, por favor indique los nombres adicionales y si están incluidos en su reclamo.

Es muy importante que contestes **todas** las preguntas completamente y con precisión. Por favor enviar todo junto en un correo electrónico, fax o carta por correo las respuestas. Tenga en cuenta que si usted vende o vende su coche después de 28 de junio de 2016 no será un vendedor elegible o derecho propietario.



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OF
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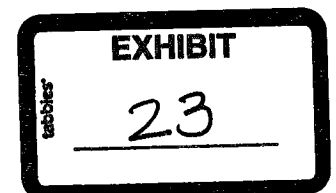
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July 27, 2016

On July 26, 2016, the court granted preliminary approval of "Volkswagen's 2.0-Liter TDI Diesel Emissions Settlement Program". The U.S. District Court Judge Charles Breyer set the settlement in motion, to allow Volkswagen and plaintiff attorneys to begin collecting information from all affected consumers such as yourself.

In the next couple days, the settlement website (www.VWCourtSettlement.com) will allow you to enter your Vehicle Identification Number (VIN) and mileage to see your expected offer from VW. Although we are doing this for you, you are more than welcome to enter your information on the website portal as well. Our next task will be comparing their offer to the research we have done on the September 18, 2015 NADA clean trade in value and history report for your vehicle. Please allow us a couple weeks to send you all of this information. At that time, we can discuss the next steps moving forward and which route you wish to take in regards to Volkswagen's offer or your individual lawsuit.

Please see the attached document to review the details regarding the settlements and to answer any questions you may have.





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27 de Julio de 2016

26 de Julio de 2016, la Corte otorgó aprobación preliminar del "Volkswagen 2.0 litros TDI Diesel emisiones programa de asentamientos". El juez de la corte de distrito de Estados Unidos Charles Breyer había puesta en marcha de la solución permitir que los abogados de Volkswagen y demandante comenzar a recoger la información de todos los afectados los consumidores como usted.

En los próximos días de pareja, el sitio web del acuerdo (www.VWCourtSettlement.com) le permitirá que ingrese su número de identificación vehicular (VIN) y el kilometraje para ver su esperada oferta de VW. Aunque estamos haciendo esto para ti, estás más que Bienvenido entrar su información en el portal web así. Nuestra siguiente tarea será comparando su oferta a la investigación que hemos hecho en el 18 de septiembre de 2015 NADA limpiar el comercio en valor e historia informe para su vehículo. Por favor Permítanos un par de semanas a enviar toda esta información. En ese momento, podemos discutir los próximos pasos hacia adelante y camino que desea tomar en lo que respecta a la oferta de Volkswagen o el juicio individual.

Por favor vea el documento adjunto para revisar los detalles con respecto a los asentamientos y para responder a cualquier pregunta que pueda tener. Nos gustaría pedir disculpas por le proporciona los detalles de los asentamientos en inglés. Estamos a la espera de Volkswagen actualizar los documentos en español. En cuanto recupere esta información, le notificaremos inmediatamente y le enviará los documentos necesarios. Gracias por su paciencia.

EXECUTIVE SUMMARY OF PROPOSED
CLASS SETTLEMENT PROGRAM

The goal of the Volkswagen Class Settlement Program is to compensate everyone who owned or leased a Volkswagen or Audi 2.0-liter TDI vehicle ("Eligible Vehicle") on September 18, 2015 (the date the emissions allegations became public), or who now owns an Eligible Vehicle. Volkswagen has agreed to create a single funding pool of a maximum of \$10,033,000,000 from which Class Members will be compensated under the Class Settlement Program.

Cars sometimes change hands, so Class Members are grouped into three different categories: Eligible Owners, Eligible Sellers, and Eligible Lessees.

Most Class Members owned an Eligible Vehicle on September 18, 2015, and still have possession of that car. These Class Members have two options: (1) have Volkswagen buy back the car ("Buyback") immediately, or (2) wait to see whether the EPA and CARB approve a modification of the vehicle to reduce emissions ("Approved Emissions Modification") for the car's engine type, and then decide whether to sell their car back to Volkswagen or accept a free Approved Emissions Modification.

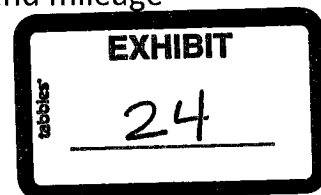
Class Members who had an active lease for an Eligible Vehicle on September 18, 2015 also have two options: (1) terminate their lease with no early termination penalty ("Lease Termination"), or (2) keep their car and receive an emissions modification to the vehicle, if approved by the EPA and CARB ("Approved Emissions Modification").

Class Members who do not exclude themselves from the Class Settlement Program will receive a cash payment in addition to either the Buyback / Lease Termination or the free Approved Emissions Modification, as described below. If you exclude yourself from the Class, you may still obtain an Approved Emissions Modification if available for your car, but you cannot receive a Buyback or Lease Termination, and you will not receive any cash payment.

Benefits to Owners / Lessees

Buyback

If a Class Member who owns a car chooses a Buyback, the price Volkswagen will pay for that car is the September 2015 National Automobile Dealers Association ("NADA") Clean Trade In value of the car adjusted for options and mileage



("Vehicle Value"). This figure is the value of the car in September 2015, before the emissions accusations became public. Owners receive their Vehicle Value, **plus** an additional cash payment ("Owner Restitution"). The Owner Restitution payment is calculated at 20% of the Vehicle Value plus \$2,986.73. The minimum Owner Restitution payment for any Class Member—to be paid on top of the Vehicle Value—will be \$5,100. Some Class Members may receive as much as approximately \$10,000 in Owner Restitution.

Because a car may have more than one owner during the relevant period, for those cars that changed hands after September 18, 2015 and during the claims period, the settlement equitably divides the Owner Restitution payment approximately 50/50 between the owner as of September 18, 2015 who later sold the car ("Eligible Seller") and the current owner ("Eligible Owner"). To qualify for an Eligible Seller restitution payment, you will have at least 45 days from the entry of the Preliminary Approval Order to identify yourself. If preliminary approval is granted by the Court on July 26, 2016 (the date of the preliminary approval hearing), you will have until September 16, 2016, to identify yourself. Note that if you sell your car after June 28, 2016, you will not be an Eligible Seller (or an Eligible Owner).

Lease Termination

Eligible Lessees who choose a Lease Termination will have their leases terminated with no early termination fee, plus receive a Lessee Restitution payment of approximately half of what a Class Member who owns an identical car would receive as Owner Restitution.

Approved Emissions Modification

The Environmental Protection Agency ("EPA"), the California Air Resources Board ("CARB") and Volkswagen have negotiated a timeline that allows Volkswagen to submit (according to engine type) proposed emissions modifications to EPA/CARB for approval. The submission, testing, and approval process take time, so Class Members may not know whether their cars have an Approved Emissions Modification immediately upon final approval of the settlement, and possibly not until May 1, 2018.

If a modification for a particular engine type ultimately is approved, Class Members who own those cars will be notified when the modification is ready, and will be able to bring their cars into a Volkswagen or Audi dealership to have the

Approved Emissions Modification performed free of charge. They will also receive the same Owner Restitution or Lessee Restitution payment as available to owners or lessees who choose a Buyback or Lease Termination.

Class Members who choose an Approved Emissions Modification will receive disclosures about the effects of the modification on performance and durability, an Extended Emissions Warranty, and a Lemon Law-type remedy that covers the Approved Emissions Modification.

If no modification is approved for your car before May 1, 2018, you will be notified that no emissions modification is available. At that point, you will have until June 1, 2018, to accept a Buyback or to exclude yourself from the Class.

If you own a vehicle for which an approved modification does become available, you will be able to receive that modification free of charge, but the restitution payment will be paid **only** to those who choose to participate in the Class Settlement Program and who do not opt out.

How to Obtain Settlement Benefits

If preliminary approval is granted by the Court, on July 26, 2016 (the date of the preliminary approval hearing), the settlement website will allow Class Members to enter their Vehicle Identification Number ("VIN") and mileage to see the expected Vehicle Value and Owner or Lessee Restitution payment for their vehicle, based on its model year, trim line, actual equipment and options. To see a non-binding estimate of the range of compensation you might receive through the Class Settlement Program, please review the attached chart.

Volkswagen has agreed to begin the Class Settlement Program immediately after the Court grants final approval and enters the DOJ Consent Decree.

Volkswagen will complete (1) a Buyback of an Eligible Vehicle within 90 days of an Eligible Owner's acceptance of Volkswagen's Buyback offer, (2) a Lease Termination of an Eligible Vehicle within 45 days of an Eligible Lessee's acceptance of Volkswagen's Lease Termination offer, and (3) once approved by the EPA/CARB, an Approved Emissions Modification to an Eligible Vehicle within 90 days of an Eligible Owner's or Eligible Lessee's acceptance of Volkswagen's Approved Emissions Modification Offer. States that accept money through the EPA/CARB settlement cannot refuse to register your vehicle as a result of the emissions problems at issue in this case. If any state does not accept money

through the EPA/CARB settlement, it will not be bound by these settlements, but it is anticipated that Class Members will be allowed to drive their cars legally through the course of the Class Settlement Program, while they await their Buyback or Approved Emissions Modification.

Under the related settlement between Volkswagen and the United States Department of Justice ("DOJ") on behalf of the Environmental Protection Agency, and the State of California by and through the California Air Resources Board and the California Attorney General ("CA AG"), owners and lessees who choose to exclude themselves ("opt out") from the Class Settlement Program can still obtain an Approved Emissions Modification at no cost if one becomes available, but they will not be eligible for the restitution payments or Buyback / Lease Termination provided for by the Class Settlement Program.

Environmental Relief

On top of the compensation described above, under settlements with EPA and CARB, Volkswagen will pay \$2.7 billion into a Trust. The purpose of the Trust is to support environmental programs throughout the country that will reduce NOx in the atmosphere by an amount equal to or greater than the combined NOx pollution caused by the cars that are the subject of this lawsuit. In addition, Volkswagen must spend \$2 billion to promote non-polluting cars ("zero emissions vehicles" or "ZEV"), over and above any amount Volkswagen previously planned to spend on such technology. EPA and CARB will oversee and monitor, and the Court will enforce, Volkswagen's compliance with the Trust payment and the ZEV investment.

Attorneys' Fees

In class actions, the court must approve all plaintiffs' attorneys' fees and costs. Volkswagen has agreed to pay the attorneys' fees and costs that the court approves in addition to the settlement benefits described above. This means that Class Members will receive 100% of the compensation described in this Executive Summary, and that their compensation will not be reduced by attorneys' fees or costs.

Summary

This Class Settlement Program gives Volkswagen or Audi 2.0-liter TDI vehicle owners and lessees a choice between (1) a Buyback (based on pre-September 18, 2015 market value) or Lease Termination and (2) a free Approved Emissions Modification **plus** (3) a cash payment ranging, for most owners, from \$5,100 to approximately \$10,000 per vehicle.

Please note that this is only a summary of the settlement benefits. The Class Settlement Program and the related government settlements are comprehensive agreements that address the concerns of hundreds of thousands of owners/lessees and several governmental entities, so there are many points that are not included in this summary. The full details of the Class Settlement Program and the texts of the government settlements will be available online at www.VWCourtSettlement.com.

The Class Settlement Program and the related government settlements are subject to the Court's approval.

Settlement Payments to Owners

The tables below show the range of possible payment amounts to owners under the Class Action Settlement. The amount you will be offered depends on whether you choose a Buyback or an Approved Emissions Modification and your car's model year, model, trim level, and factory options. The Approved Emissions Modification option will only be available if a modification is approved by the EPA and CARB.

If you choose the Buyback option, you will receive your car's September 2015 Clean Trade Vehicle Value, plus a cash payment, ranging from a minimum of \$5,100 to nearly \$10,000, depending on your vehicle. If you choose the emissions modification option, you will receive a free modification plus the same cash payment. The range of total cash payments is summarized in the chart below.

Your payment will be adjusted if your car has higher or lower than standard mileage when you bring it into a dealership to participate in the settlement program. If your payment is subject to a mileage adjustment, the amount you receive may be different from what is shown below, but not less than \$5,100.

These tables assume that you owned your car when the emissions accusations became public on September 18, 2015, and that you still own it. If you no longer have your car or if you purchased it after September 18, 2015, then you will be offered a lesser amount, assuming you qualify for the settlement.

Beginning July 26, 2016, you can see the exact Buyback and Approved Emissions Modification payments for your car by visiting www.VWCourtSettlement.com and entering your Vehicle Identification Number (VIN), mileage, and other required information.

Volkswagen Owners			
<div> <div> Instructions Find your car's Model Year, Model, and Trim below </div> <div> Option 1 Sell your car back to VW plus a cash payment for a combined total of: </div> <div> Option 2 Keep your car, get a free modification to reduce emissions plus a cash payment of: </div> </div>			
MODEL YEAR	MODEL AND TRIM	BUYBACK	APPROVED EMISSIONS MODIFICATION
2009	VW Jetta Sedan TDI	\$12,475 - \$14,025	\$5,100 - \$5,100
	VW Jetta SportWagen TDI	\$13,600 - \$15,125	\$5,100 - \$5,100
2010	VW Golf Hatchback 2D TDI	\$15,025 - \$16,877	\$5,100 - \$5,302
	VW Golf Hatchback 4D TDI	\$15,500 - \$17,447	\$5,100 - \$5,397
	VW Jetta Sedan TDI	\$13,675 - \$15,350	\$5,100 - \$5,100
	VW Jetta Sedan TDI Cup Street Edition	\$15,625 - \$17,087	\$5,100 - \$5,337
	VW Jetta SportWagen TDI	\$14,775 - \$16,607	\$5,100 - \$5,257
2011	VW Golf Hatchback 2D TDI	\$17,657 - \$19,817	\$5,432 - \$5,792
	VW Golf Hatchback 4D TDI	\$18,497 - \$20,657	\$5,572 - \$5,932
	VW Jetta Sedan TDI	\$16,217 - \$18,347	\$5,192 - \$5,547
	VW Jetta SportWagen TDI	\$18,227 - \$20,357	\$5,527 - \$5,882
2012	VW Golf Hatchback 2D TDI	\$19,457 - \$21,707	\$5,732 - \$6,107
	VW Golf Hatchback 4D TDI	\$20,267 - \$22,517	\$5,867 - \$6,242
	VW Jetta Sedan TDI	\$18,317 - \$20,867	\$5,542 - \$5,967
	VW Jetta SportWagen TDI	\$19,907 - \$22,097	\$5,807 - \$6,172
	VW Passat Sedan TDI SE	\$19,007 - \$21,467	\$5,657 - \$6,067
	VW Passat Sedan TDI SEL	\$23,267 - \$23,387	\$6,367 - \$6,387
2013	VW Beetle Coupe TDI	\$20,627 - \$23,447	\$5,927 - \$6,397
	VW Beetle Convertible TDI	\$24,047 - \$26,147	\$6,497 - \$6,847
	VW Golf Hatchback 2D TDI	\$20,657 - \$23,117	\$5,932 - \$6,342
	VW Golf Hatchback 4D TDI	\$21,377 - \$23,837	\$6,052 - \$6,462
	VW Jetta Sedan TDI	\$20,777 - \$23,897	\$5,952 - \$6,472
	VW Jetta SportWagen TDI	\$23,357 - \$25,727	\$6,382 - \$6,777
	VW Passat Sedan TDI SE	\$21,587 - \$24,257	\$6,087 - \$6,532
	VW Passat Sedan TDI SEL	\$26,807 - \$26,927	\$6,957 - \$6,977
2014	VW Beetle Coupe TDI	\$22,907 - \$25,847	\$6,307 - \$6,797
	VW Beetle Convertible TDI	\$27,047 - \$29,237	\$6,997 - \$7,362
	VW Golf Hatchback 4D TDI	\$23,957 - \$26,177	\$6,482 - \$6,852
	VW Jetta Sedan TDI	\$21,137 - \$26,117	\$6,012 - \$6,842
	VW Jetta SportWagen TDI	\$26,657 - \$29,117	\$6,932 - \$7,342
	VW Passat Sedan TDI SE	\$26,117 - \$28,877	\$6,842 - \$7,302
	VW Passat Sedan TDI SEL	\$28,847 - \$28,967	\$7,297 - \$7,317

MODEL YEAR	MODEL AND TRIM	BUYBACK	APPROVED EMISSIONS MODIFICATION
2015	VW Beetle Coupe TDI	\$24,156 - \$31,686	\$6,515 - \$7,770
	VW Beetle Convertible TDI	\$27,937 - \$33,835	\$7,145 - \$8,128
	VW Golf Hatchback 4D TDI S	\$21,806 - \$26,700	\$6,123 - \$6,939
	VW Golf Hatchback 4D TDI SE	\$24,022 - \$29,306	\$6,493 - \$7,373
	VW Golf Hatchback 4D TDI SEL	\$24,022 - \$31,728	\$6,493 - \$7,777
	VW Golf SportWagen TDI S	\$24,043 - \$28,588	\$6,496 - \$7,254
	VW Golf SportWagen TDI SE	\$26,282 - \$30,743	\$6,869 - \$7,613
	VW Golf SportWagen TDI SEL	\$24,022 - \$32,876	\$6,493 - \$7,968
	VW Jetta Sedan TDI S	\$21,410 - \$24,696	\$6,057 - \$6,605
	VW Jetta Sedan TDI SE	\$22,800 - \$26,458	\$6,289 - \$6,899
	VW Jetta Sedan TDI SEL	\$24,809 - \$30,149	\$6,624 - \$7,514
	VW Passat Sedan TDI SE	\$28,367 - \$31,127	\$7,217 - \$7,677
	VW Passat Sedan TDI SEL	\$32,747 - \$32,867	\$7,947 - \$7,967

Audi Owners

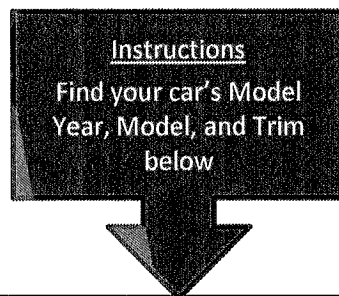
MODEL YEAR	MODEL AND TRIM	BUYBACK	APPROVED EMISSIONS MODIFICATION
2010	Audi A3 TDI Premium	\$18,947 - \$20,627	\$5,647 - \$5,927
	Audi A3 TDI Premium Plus	\$20,627 - \$23,267	\$5,927 - \$6,367
2011	Audi A3 TDI Premium	\$21,287 - \$23,267	\$6,037 - \$6,367
	Audi A3 TDI Premium Plus	\$23,297 - \$26,867	\$6,372 - \$6,967
2012	Audi A3 TDI Premium	\$23,717 - \$25,727	\$6,442 - \$6,777
	Audi A3 TDI Premium Plus	\$26,357 - \$30,077	\$6,882 - \$7,502
2013	Audi A3 TDI Premium	\$25,517 - \$27,647	\$6,742 - \$7,097
	Audi A3 TDI Premium Plus	\$29,357 - \$33,287	\$7,382 - \$8,037
2015	Audi A3 TDI Premium	\$31,805 - \$39,413	\$7,790 - \$9,058
	Audi A3 TDI Premium Plus	\$34,064 - \$43,998	\$8,166 - \$9,822
	Audi A3 TDI Prestige	\$39,076 - \$44,176	\$9,002 - \$9,852

Settlement Payments to Lessees

The tables below show the range of possible payment amounts to lessees under the Class Action Settlement. The amount you will be offered depends on your car's model year, model, trim level, and factory options. The amount you will be offered will be the same whether you choose a Lease Termination or an Approved Emissions Modification or no longer have an active lease. The Approved Emissions Modification option will only be available if a modification is approved by the EPA and CARB.

These tables assume that you had a leased car with VW Credit, Inc. when the emissions accusations became public on September 18, 2015, and that you did not purchase that car on or before June 28, 2016. If you purchased your leased car on or before June 28, 2016, then you are considered an owner and should use the tables on the previous two pages to find your payment range.

Beginning July 26, 2016, you can see the exact Lessee Restitution payment amount for your car by visiting www.VWCourtSettlement.com and entering your Vehicle Identification Number (VIN) and other required information.



Volkswagen Lessees

MODEL YEAR	MODEL AND TRIM	LESSEE PAYMENT
2011	VW Jetta Sedan TDI	\$2,634 - \$2,807
	VW Jetta SportWagen TDI	\$2,877 - \$2,922
2012	VW Golf Hatchback 2D TDI	\$2,902 - \$3,062
	VW Golf Hatchback 4D TDI	\$2,969 - \$3,157
	VW Jetta Sedan TDI	\$2,807 - \$3,019
	VW Jetta SportWagen TDI	\$2,939 - \$3,122
	VW Passat Sedan TDI SE	\$2,864 - \$3,069
	VW Passat Sedan TDI SEL	\$3,219 - \$3,229
2013	VW Beetle Coupe TDI	\$2,999 - \$3,234
	VW Beetle Convertible TDI	\$3,284 - \$3,459
	VW Golf Hatchback 2D TDI	\$3,002 - \$3,207

MODEL YEAR	MODEL AND TRIM	LESSEE PAYMENT
	VW Golf Hatchback 4D TDI	\$3,062 - \$3,267
	VW Jetta Sedan TDI	\$3,012 - \$3,272
	VW Jetta SportWagen TDI	\$3,227 - \$3,424
	VW Passat Sedan TDI SE	\$3,079 - \$3,302
	VW Passat Sedan TDI SEL	\$3,514 - \$3,524
2014	VW Beetle Coupe TDI	\$3,189 - \$3,434
	VW Beetle Convertible TDI	\$3,537 - \$3,717
	VW Golf Hatchback 4D TDI	\$3,277 - \$3,462
	VW Jetta Sedan TDI	\$3,042 - \$3,457
	VW Jetta SportWagen TDI	\$3,502 - \$3,707
	VW Passat Sedan TDI SE	\$3,457 - \$3,687
	VW Passat Sedan TDI SEL	\$3,684 - \$3,694
2015	VW Beetle Coupe TDI	\$3,314 - \$3,915
	VW Beetle Convertible TDI	\$3,650 - \$4,052
	VW Golf Hatchback 4D TDI S	\$3,064 - \$3,364
	VW Golf Hatchback 4D TDI SE	\$3,348 - \$3,689
	VW Golf Hatchback 4D TDI SEL	\$3,553 - \$3,886
	VW Golf SportWagen TDI S	\$3,284 - \$3,471
	VW Golf SportWagen TDI SE	\$3,528 - \$3,834
	VW Golf SportWagen TDI SEL	\$3,713 - \$4,008
	VW Jetta Sedan TDI S	\$3,064 - \$3,446
	VW Jetta Sedan TDI SE	\$3,239 - \$3,468
	VW Jetta Sedan TDI SEL	\$3,406 - \$3,755
	VW Passat Sedan TDI SE	\$3,644 - \$3,874
	VW Passat Sedan TDI SEL	\$4,009 - \$4,019

Audi Lessees

MODEL YEAR	MODEL AND TRIM	LESSEE PAYMENT
2012	Audi A3 TDI Premium	\$3,287 - \$3,344
	Audi A3 TDI Premium Plus	\$3,534 - \$3,782
2013	Audi A3 TDI Premium	\$3,439 - \$3,519
	Audi A3 TDI Premium Plus	\$3,729 - \$4,052
2015	Audi A3 TDI Premium	\$3,931 - \$4,616
	Audi A3 TDI Premium Plus	\$4,122 - \$4,955
	Audi A3 TDI Prestige	\$4,536 - \$4,899



9/29/2016

NADA Used Cars/Trucks

The Law Offices of Maloney and Campolo

Diane Suniga

926 S Alamo St
San Antonio, TX 78205
210-922-2200

cfurgeson@maloneyandcampolo.com

Vehicle InformationVehicle: 2013 Volkswagen Passat Sedan 4D SEL
TDI 2.0L I4 T-Diesel

Region: Southwestern

Period: September 18, 2015

VIN: 1VWCN7A39DC031264

Mileage: 34,348

Base MSRP: \$32,915

Typically Equipped MSRP: \$33,710

Weight: 3,459

**NADA Used Cars/Trucks Values**

Auction*	Base	Mileage Adj.	Option Adj.	Adjusted Value
Low	\$15,200	\$594	\$0	\$15,794
Average	\$17,875	\$594	\$0	\$18,469
High	\$20,575	\$594	\$0	\$21,169
Trade-In				
Rough	\$16,925	\$650	\$0	\$17,575
Average	\$18,525	\$650	\$0	\$19,175
Clean	\$19,850	\$650	\$0	\$20,500
Clean Loan	\$17,875	\$650	\$0	\$18,525
Clean Retail	\$22,925	\$650	\$0	\$23,575

*The auction values displayed include typical equipment and adjustments for mileage and any of the following applicable accessories: engine size, drivetrain, and trim.

Selected Options

	Trade-In/Loan	Retail
Navigation System	w/body	w/body
Aluminum/Alloy Wheels	w/body	w/body
Leather Seats	w/body	w/body
Power Sunroof	w/body	w/body

EXHIBIT**25**



Your AutoCheck Vehicle History Report

Report run date July 15, 2016 16 09 7 EDT

2013 Volkswagen Passat SE 2.0 TDI

VIN: 1VWBN7A33DC120906

Year: 2013

Make: Volkswagen

Model: Passat SE 2.0 TDI

Style/Body: Sedan 4D

Class: Mid Range Car - Premium

Engine: 2.0L I4 DI

Country of Assembly: United States

Vehicle Age: 3

Calculated Owners: 2



MULTIPLE OWNERS

Calculated Owners: 2



Accident Check

Reported Accidents: 1



Title and Problem Check

Major title or other problem(s) reported



Odometer Check

Your vehicle checks out
Last Reported Odometer: 36,938



Vehicle Use and Event Check

Specific vehicle use(s) or events reported

This vehicle's AutoCheck Score



The AutoCheck Score is a summary of your vehicle's history. It lets you compare similar vehicles with ease.

This vehicle does not qualify for Buyback Protection

DOES NOT QUALIFY
FOR BUYBACK PROTECTION



Unfortunately, this vehicle does not qualify for our Buyback Protection program.

Continued on next page

EXHIBIT

26

tabbies



No odometer problem title record



Rebuilt/rebuildable title record(s)



Salvage title or salvage auction record(s)



No water damaged title record



No NHTSA crash test record



No frame/unibody damage record



No recycling facility record

Odometer Check



Your vehicle checks out: AutoCheck examined the reported odometer readings reported to AutoCheck for this 2013 Volkswagen Passat SE 2.0 TDI (1VWBN7A33DC120906) and no indication of an odometer rollback or tampering was found. AutoCheck uses business rules to determine if reported odometer readings are significantly less than previously reported values. Not all reported odometer readings are used. Title and auction events also report odometer tampering or breakage.

**0 Problem(s)
Reported:**

Mileage

Date Reported



132

09/24/2013



29,000

09/03/2014



36,938

03/19/2015

Vehicle Use and Event Check



Information Reported: AutoCheck shows additional vehicle uses or events reported to AutoCheck for this 2013 Volkswagen Passat SE 2.0 TDI (1VWBN7A33DC120906). This includes reported vehicle uses such as rental or lease, and events such as whether the vehicle has been reported to have had a loan/lien or duplicate title issued. Other events show if the vehicle has a reported accident and how many calculated accidents or if it has been reported stolen or repossessed. It is recommended to have pre-owned vehicles inspected by a third party prior to purchase.

0 Event(s)

6 Vehicle uses checked:

Detailed Vehicle History

Below are the historical events for this vehicle listed in chronological order. Any discrepancies will be in bold text.



MULTIPLE OWNERS

Calculated Owners 2

Report Run Date: July 15, 2016 16:09:07 EDT

Vehicle: 2013 Volkswagen Passat SE 2.0 TDI (1VWBN7A33DC120906)

Event Date	Event Location	Odometer Reading	Data Source	Event Detail
08/23/2013			Independent Source	VEHICLE MANUFACTURED AND SHIPPED TO DEALER
09/24/2013	EAGLEVILLE, TN	132	Motor Vehicle Dept.	TITLE (Title # 91775988) (Lien Reported) REGISTRATION EVENT/RENEWAL
09/26/2013	EAGLEVILLE, TN		Motor Vehicle Dept.	TITLE (Title # 91775988) (Lien Reported)
09/03/2014	TN	29,000	Motor Vehicle Dept.	PASSED EMISSION INSPECTION
09/06/2014	EAGLEVILLE, TN		Motor Vehicle Dept.	REGISTRATION EVENT/RENEWAL
12/30/2014	LA		Auto Insurance Source	VEHICLE REPORTED AS TOTAL LOSS VEHICLE LOSS CAUSED BY COLLISION
12/30/2014	LA		State Agency	ACCIDENT REPORTED (Case # 20140048838)
12/30/2014	LA		Police Report	ACCIDENT REPORTED (Case # 20140048838)
12/30/2014	LA		State Agency	MINOR DAMAGE REPORTED
03/19/2015	NASHVILLE, TN	36,938	Motor Vehicle Dept.	TITLE (Title # S0918599)
03/19/2015	NASHVILLE, TN		Motor Vehicle Dept.	REBUILT/REBUILDABLE SALVAGE
04/16/2015	AUSTIN, TX		Motor Vehicle Dept.	REGISTRATION EVENT/RENEWAL REBUILT/REBUILDABLE SALVAGE
04/23/2015	AUSTIN, TX		Motor Vehicle Dept.	TITLE (Title #:22732642108131933) REBUILT/REBUILDABLE SALVAGE
03/01/2016	TX		Motor Vehicle Dept.	REBUILT/REBUILDABLE SALVAGE
04/01/2016	AUSTIN, TX		Motor Vehicle Dept.	REGISTRATION EVENT/RENEWAL REBUILT/REBUILDABLE SALVAGE

About AutoCheck

AutoCheck vehicle history reports by Experian Automotive is the leading vehicle history reporting service. With expert data handling, the Experian Automotive database houses over 4 billion records on a half a billion vehicles. Every AutoCheck vehicle history report will give you confidence when buying or selling your next used vehicle, with superior customer service every step of the way.

Patent Notice

Certain aspects of this vehicle history report may be covered by U.S. Patent 8,005,759

Volkswagen Vehicle Questionnaire

Your Vehicle Identification Number (VIN):

1. Current odometer reading:
2. Is this vehicle registered to a business or company?
3. Vehicle Registration Address (This could be different than your mailing address. This is the address on file with the state department of motor vehicles)
4. Do you currently either own or lease this vehicle?
5. Which of the statements below most accurately describes the ownership or lease of this vehicle?
 - I own this vehicle. There is no loan on this vehicle title.
 - I own this vehicle. There is an outstanding loan attached to the title that I make payments on.
 - I lease this vehicle.
6. Did you purchase this vehicle at the end of a lease from Volkswagen Credit, Inc. or Audi Financial Services?
7. Please enter the date (exact or approximate) that you purchased or leased the vehicle.
8. Do you have an outstanding balance on your vehicle?
 - If so, with who?
 - What is the account number?
 - What is the current account balance?
9. Has the odometer ever been broken, altered or replaced?
10. Did your vehicle have a Branded Title of Assembled, Dismantled, Flood, Junk, Rebuilt, Reconstructed, or Salvaged on September 18, 2015?
11. Was your vehicle acquired by any person or entity from a junkyard or salvage yard after September 18, 2015?
12. Can your vehicle be driven under its own 2.0L TDI engine power?

Please provide us with copies of:

- Purchase order
- Current vehicle registration
- Service repairs (we will not need copies for oil changes, tire changes, lamp replacements ect.)
- Driver's license



Cuestionario de vehículo Volkswagen

Su número de identificación de vehículo (VIN):

1. Lectura actual del odómetro:
2. Es este vehículo registrada a un negocio o empresa?
3. Dirección de registro de vehículo (puede ser diferente de su dirección de correo. Esta es la dirección registrada en el Departamento de estado de los vehículos de motor)
4. ¿Actualmente ya sea propio o alquilar este vehículo?
5. Cuál de las afirmaciones a continuación la mayoría describe con precisión la propiedad o contrato de arrendamiento de este vehículo?
 - Soy propietario de este vehículo. No hay ningún préstamo en este título del vehículo.
 - Soy propietario de este vehículo. Hay un préstamo excepcional unido al título que hacer pagos en.
 - Arrendamiento de este vehículo.
6. ¿Compró este vehículo al final de un contrato de arrendamiento de Volkswagen Crédito, Inc. o Audi Financia Services?
7. Introduce la fecha (exacta o aproximada) que compró o arrendó el vehículo.
8. Usted tiene un saldo pendiente en su vehículo?
 - ¿Si es así, con qué?
 - ¿Cuál es el número de cuenta?
 - ¿Qué es la balanza por cuenta corriente?
9. ¿El odómetro nunca se rompe, alterado o sustituye?
10. ¿Su vehículo tenía una marca título de montar, desmontar, inundaciones, basura, reconstruido, reconstruyó o Salvaged en 18 de septiembre de 2015?
11. Fue su vehículo adquirido por cualquier persona o entidad de una yarda de la chatarra o salvamento después de 18 de septiembre de 2015?
12. Puede conducir su vehículo bajo su propia potencia del motor 2.0L TDI?

Por favor nos proporciona con copias de:

- Orden de compra
- Matrícula actual
- Servicio de reparaciones (no necesitamos copias para cambios de aceite, cambios de neumáticos, repuestos de lámpara ect.)
- Licencia de conducir



VIN: 1VWCN7A35EC070984

☐ Your Current Mileage: 19200

☐ Your Estimated Monthly Mileage: 1042

Vehicle Buyback

ESTIMATED TOTAL

\$31,216.73

☐ Tentative Return Date

Enter date

Vehicle Return Amount

\$23,525.00

Additional Restitution

\$7,691.73

Total Buyback Amount Before Loan Payoff

\$31,216.73

☐ Total Outstanding Loan Amount

\$27,394.33

☐ Amount VW Will Pay Your Lender

-\$27,394.33

Amount VW Will Pay to You

\$3,822.40

☐ Projected Mileage at Return

20,001 -25,000

Buybacks are available to Eligible Owners who choose to **return their vehicles** for payment. The total offer compensates you for your vehicle and the cost of purchasing another vehicle, and it includes two components: 1) your vehicle return amount derived from the September 2015 NADA Used Car Guide Clean Trade including manufacturer-installed options; plus 2) additional restitution, which is the sum of a set percentage of the vehicle return amount and a flat dollar amount.

I am interested in the Buyback option. (You may change this selection later).



Emissions Modification & Extended Emissions Warranty
(if approved by EPA & CARB)

ESTIMATED TOTAL

\$7,691.73

☐ Tentative Modification Date:

Enter date

☐ Projected Mileage at Modification

20001 - 25000

Current Owners and Lessees who choose to **keep their vehicles** and receive an Approved Emissions Modification free of charge will receive an additional restitution payment, calculated using two components: 1) a percentage of the September 2015 NADA Used Car Guide Clean Trade including manufacturer-installed options; and 2) a flat dollar amount.

Vehicles receiving the approved emissions modification will also receive an **extended emissions warranty** covering the emissions system of the eligible vehicle.

I am interested in the Emissions Modification option, if approved. (You may change this election later).

(VIN: 1VWBN7A34EC043223

- ☐ su kilometraje actual: 48994
- ☐ su kilometraje mensual estimada: 1042

Recompra del vehículo

TOTAL ESTIMADO

\$26,926.73

- ☐ Fecha de retorno de tentative

Cantidad de devolución de vehículo

\$19,950.00

Restitución adicional

\$6,976.73

Total monto de recompra antes de pago de préstamo

\$26,926.73

- ☐ Cantidad total de préstamos pendientes

\$18,378.38

- ☐ Cantidad de VW se paga el prestamista

-\$18,378.38

Cantidad VW voluntad paga a usted

\$8,548.35

- ☐ **Kilometraje proyectado en retorno**

50,001 -55,000

Recompras están disponibles para los propietarios elegibles que deseen **devolver sus vehículos** para el pago. La oferta total te compensa su vehículo y el costo de la compra de otro vehículo, e incluye dos componentes: 1) la cantidad de retorno de su vehículo derivado del septiembre de 2015 NADA usado coche guía limpia comercio incluyendo opciones instaladas por el fabricante; Además 2) restitución adicional, que es la suma de un porcentaje determinado del vehículo devolver cantidad y una cantidad fija de dólares.

Estoy interesado en la opción de recompra. (Usted puede cambiar esta selección más adelante).

Modificación de las emisiones y emisiones extendida garantía
(si es aprobada por EPA & CARB)

TOTAL ESTIMADO

\$6,976.73

☐ Fecha de modificación de tentative

☐ **Kilometraje proyectado en la modificación**

50001 - 55000

Propietarios y arrendatarios que deciden **mantener sus vehículos** y reciban una modificación aprobada las emisiones de forma gratuita recibirán un pago de restitución adicional, calculado mediante dos componentes: 1) un porcentaje de la de septiembre de 2015 NADA usado coche guía limpia comercio incluyendo opciones instaladas por el fabricante; y 2) una cantidad fija de dólares.

Vehículos reciben la modificación de emisiones aprobado recibirá también una **garantía extendida de emisiones** que el sistema de emisiones del vehículo elegible.

Estoy interesado en la opción de modificación de emisiones, si se aprueba. (Usted puede cambiar esta selección más adelante).

Attached are the offers available to you for the Volkswagen Settlement Program, along with a letter from your attorney, Tim Maloney, which will help answer any questions you may have as you make a decision about your offer. Please review these documents, then complete, sign, and return the attached Volkswagen Settlement Decision form. If you intend to opt-out of Volkswagen's settlement or emissions modification offers to pursue an individual lawsuit, you will also need to complete and sign the Opt Out Form.

Included in this email are:

- 1 Your Buyback & Emissions Modification Offers for the Volkswagen Settlement Program
- 2 A letter from your Attorney
3. The Opt Out Form
- 4 A Volkswagen Settlement Decision Form

You must choose one of the following options:

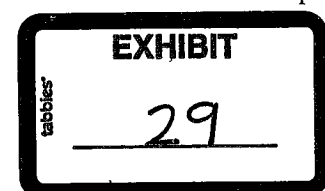
- 1 Buyback
- 2 Emissions Modification
- 3 Individual Lawsuit

If you decide to accept the buyback or emissions modification, your settlement offer will not be considered a claim until the Court approves the final settlement, which will occur in Fall 2016 (approximately October/November). If you wish to opt out of the Volkswagen Settlement (buyback or emissions modification) to pursue an individual lawsuit, we must submit a signed authorization form to the Court. **The deadline to have your opt-out form submitted to the Court is September 16, 2016.** This means that we will need the attached Opt Out Form signed as soon as possible, **but no later than September 12th, 2016,** so that we can have it submitted by the imposed deadline. **You will NOT be able to opt out after the September 16th deadline,** so it is very important that you inform us immediately if you are choosing to opt out.

Please note, **once you opt-out of VW's class settlement, you cannot go back and opt in at a later date.** Only complete and sign the Opt-Out Form if you are certain you want to file an individual lawsuit. If you are happy with Volkswagen's offer and are planning to return your vehicle in October/November, or if you are keeping your vehicle and accepting the emissions modification, there is no need to sign the Opt-Out Form. We will submit your claim and continue to update you on the progress of your settlement. **Whichever option you decide on, please complete the attached Volkswagen Settlement Decision form and return it to us as soon as possible** so we know how we will need to proceed with your case.

The attached letter from your attorney should answer any questions you may have regarding filing an individual lawsuit. You should also have received a packet in the mail from Volkswagen, which will answer any questions you may have regarding the Volkswagen Class Settlement Program options (buyback and emissions modification). If you haven't received the packet, please go to <https://www.vwcourtsettlement.com/en/> to find this information.

Due to the upcoming deadlines, it may be difficult to reach me by phone, as we are working diligently to prepare offers for all our clients. If you have any further questions as you make your decision, please email me and I will respond as soon as possible.



Unido son las ofertas disponibles a usted para el programa de asentamientos de Volkswagen, junto con una carta de su abogado, Tim Maloney, que le ayudará a responder a cualquier pregunta que tenga que tomar una decisión sobre su oferta. Por favor revisar estos documentos, a continuación, completar, firmar y devolver el formulario de la decisión del establecimiento de Volkswagen. Si desea optar por solución de Volkswagen o modificación de emisiones ofrece a perseguir una demanda individual, usted también necesitará completar y firmar el formulario Opt hacia fuera.

Incluido en este correo son:

1. La readquisición de acciones y modificación de emisiones ofrece para el programa de asentamientos de Volkswagen
2. Una carta de su abogado
3. El Opt hacia fuera de forma
4. Una forma de decisión del establecimiento de Volkswagen

Debe elegir una de las siguientes opciones:

1. readquisición de acciones
2. las emisiones modificación
3. cada demanda

Si decides aceptar la modificación de recompra o las emisiones, su oferta no se considerará una demanda hasta que el Tribunal aprueba el acuerdo final, que tendrá lugar en 2016 de otoño (octubre y noviembre, aproximadamente). Si desea optar por el establecimiento de Volkswagen (modificación de recompra o emisiones) a perseguir una demanda individual, nosotros debemos presentar un formulario de autorización firmado ante el Tribunal. **La fecha límite para tener el formulario opt-hacia fuera sometido a la corte es 16 de septiembre de 2016.** Este significa que vamos a necesitar el Opt hacia fuera formulario adjunto firmado tan pronto como sea posible, **pero no más tarde del 12 de septiembreth, 2016**, de modo que podamos lo tenemos presentado en el plazo impuesto. **Que usted no podrá optar después del mes de septiembre fecha límite 16 de^{mayo}**, por lo que es muy importante que usted nos informe inmediatamente si elige excluirse.

Nota: una vez que usted optar por solución de clase de VW, no puede volver y optar en una fecha posterior. Solamente completar y firmar el formulario Opt-Out si está seguro de que desea presentar una demanda individual. Si usted es feliz con la oferta de Volkswagen y planea devolver su vehículo en octubre y noviembre, o si usted está manteniendo su vehículo y aceptación de la modificación de emisiones, no hay para firmar el formulario Opt-Out. Presentar su reclamo y seguir para actualizarlo sobre la marcha de su establecimiento. **Cualquier opción de decidir, por favor complete el formulario de la decisión del establecimiento de Volkswagen y volver a nosotros tan pronto como sea posible** para saber cómo tenemos que proceder con su caso.

La carta adjunta de la fiscalía debe responder a cualquier pregunta que tenga con respecto a presentar una demanda individual. Usted también debería haber recibido un paquete en el correo de Volkswagen, que responderá a cualquier pregunta que pueda tener con respecto a las opciones de programa de establecimiento de la clase de Volkswagen (modificación de la readquisición de acciones y emisiones). Si no has recibido el paquete, por favor vaya a <https://www.vwcourtsettlement.com/en/> encontrar esta información.

Debido a los próximos plazos, puede ser difícil llegar a nuestra oficina por teléfono, como estamos trabajando diligentemente para preparar ofertas para todos nuestros clientes. Si usted tiene cualquier preguntas más otra que usted tome su decisión, por favor envíeme un correo electrónico y responderá tan pronto como sea posible.

VIN: 3VWLL7AJ7EM282109

☐ Your Current Mileage: 57105

☐ Your Estimated Monthly Mileage: 1042

Vehicle Buyback

ESTIMATED TOTAL

\$21,609.03

☐ Tentative Return Date

Enter date

Vehicle Return Amount

\$14,925.00

Additional Restitution

\$5,971.73

Total Buyback Amount Before Loan Payoff

\$20,896.73

☐ Total Outstanding Loan Amount

\$21,609.03

Loan Amount that VW Will Pay in addition to Buyback Amount

\$712.30

☐ Amount VW Will Pay Your Lender

-\$21,609.03

Amount VW Will Pay to You

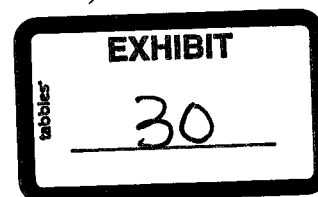
\$0.00

☐ Projected Mileage at Return

55,001 -60,000

Buybacks are available to Eligible Owners who choose to **return their vehicles** for payment. The total offer compensates you for your vehicle and the cost of purchasing another vehicle, and it includes two components: 1) your vehicle return amount derived from the September 2015 NADA Used Car Guide Clean Trade including manufacturer-installed options; plus 2) additional restitution, which is the sum of a set percentage of the vehicle return amount and a flat dollar amount.

☒ I am interested in the Buyback option. (You may change this selection later).



Emissions Modification & Extended Emissions Warranty
(if approved by EPA & CARB)

ESTIMATED TOTAL

\$5,971.73

☐ Tentative Modification Date:

Enter date

☐ Projected Mileage at Modification

55001 - 60000

Current Owners and Lessees who choose to **keep their vehicles** and receive an Approved Emissions Modification free of charge will receive an additional restitution payment, calculated using two components: 1) a percentage of the September 2015 NADA Used Car Guide Clean Trade including manufacturer-installed options; and 2) a flat dollar amount.

Vehicles receiving the approved emissions modification will also receive an **extended emissions warranty** covering the emissions system of the eligible vehicle.

I am interested in the Emissions Modification option, if approved. (You may change this selection later).

VIN: 3VWLA7AJ0FM342013

- ☐ su kilometraje actual: 31844
☐ su kilometraje mensual estimada: 1042

Recompra del vehículo

TOTAL ESTIMADO

\$27,831.53

Fecha de retorno de ☐ tentative

Escriba la fecha

11/1/2016

Cantidad de devolución de vehículo

\$20,704.00

Restitución adicional

\$7,127.53

Total monto de recompra antes de pago de préstamo

\$27,831.53

☐ Cantidad total de préstamos pendientes

\$23,597.68

☐ Cantidad de VW se paga el prestamista

-\$23,597.68

Cantidad VW voluntad paga a usted

\$4,233.85

Kilometraje ☐ proyectado en retorno

30,001-35,000

Recompras están disponibles para los propietarios elegibles que deseen **devolver sus vehículos** para el pago. La oferta total te compensa su vehículo y el costo de la compra de otro vehículo, e incluye dos componentes: 1) la cantidad de retorno de su vehículo derivado del septiembre de 2015 NADA usado coche guía limpia comercio incluyendo opciones instaladas por el fabricante; Además 2) restitución adicional, que es la suma de un porcentaje determinado del vehículo devolver cantidad y una cantidad fija de dólares.

Estoy interesado en la opción de recompra. (Usted puede cambiar esta selección más adelante).

Modificación de las emisiones y emisiones extendida garantía
(si es aprobada por EPA & CARB)

TOTAL ESTIMADO

\$7,127.53

Fecha de modificación de ☐ tentative

Escriba la fecha

11/8/2016

Modificación inicial

\$4,751.69

Modificación posterior

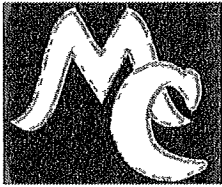
\$2,375.84

Si se aprueba una modificación de emisiones de EPA y CARB, sus vehículos elegibles tendrá que ser modificada en dos etapas. Usted recibirá dos tercios (2/3) el pago de restitución sobre la terminación de la modificación inicial y el tercio (1/3 restante) el pago de restitución al término de la modificación posterior. Además, usted también recibirá un cambio de aceite gratis y filtro de aceite en los posteriores. Si no posee o arrienda el vehículo cuando recibe la modificación posterior, el propietario o el arrendatario en el momento se tendrá derecho a recibir el pago de modificación posterior.

Propietarios y arrendatarios que deciden **mantener sus vehículos** y reciban una modificación aprobada las emisiones de forma gratuita recibirán un pago de restitución adicional, calculado mediante dos componentes: 1) un porcentaje de la de septiembre de 2015 NADA usado coche guía limpia comercio incluyendo opciones instaladas por el fabricante; y 2) una cantidad fija de dólares.

Vehículos reciben la modificación de emisiones aprobado recibirá también una **garantía extendida de emisiones** que el sistema de emisiones del vehículo elegible.

Estoy interesado en la opción de modificación de emisiones, si se aprueba. (Usted puede cambiar esta selección más adelante).



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

August 24, 2016

TO. ALL VOLKSWAGEN CLIENTS

I know this is an exciting, yet confusing time. Should you take the settlement? What are your options? Should you opt out and continue to pursue an individual lawsuit?

Let's address these issues in order:

Depending on the State in which you reside, pursuing a DTPA (Deceptive Trade Practices Act), against Volkswagen will take approximately a year to eighteen months to conclude. While I feel these are some of the strongest DTPA claims that I have ever come across, the amount of damages can be left in the hands of a jury, which at times, is unpredictable. There are certain automatic damages, if for example, the jury finds that fraud was committed. These damages can actually triple the amount of the award.

The difficulty in opting out is what happens to your automobile. Unfortunately, it would require continuing to drive your vehicle. Also, it would be extremely difficult to sell it without the emissions fix.

The bottom line is, you want to know whether it is worth pursuing individual cases, instead of accepting Volkswagens offer. Quite frankly, that is a personal decision because the business aspects are the time benefit of money, meaning getting paid within the next 60 to 90 days after final approval in October 2016, or pursuing litigation which may take approximately a year to a year and a half. The numbers that we are seeing from Volkswagen aren't insulting, and are in actuality, decent, and pretty fair.

The bottom line is:

1. In order to pursue litigation you can count on another year or year and a half and you would have to hold on to your vehicle perhaps in an unrepaid state until a deal could be worked out with Volkswagen on effectuating the emissions control fix.
2. These are very strong DTPA claims, but they are time consuming and they are left to the vagaries of the jury system.
3. The most enticing aspect of the Volkswagen settlement for you, the client, is the fact that Volkswagen is offering a fair and reasonable amount of money.

We will of course, keep you informed of any developments as soon as we have them.

Sincerely,

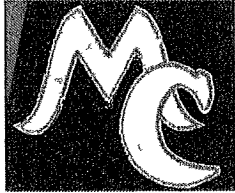
Tim Maloney

TM:mcl

926 S. Alamo, San Antonio, Texas 78205
Telephone (210)922-2200 • Toll Free (888)513-6198 • Facsimile (210)922-2201
www.maloneyandcampolo.com
*Licensed in Illinois

EXHIBIT

31



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

PARA: TODOS LOS CLIENTES DE VOLKSWAGEN

Sé que este es un emocionante, todavía confuso momento. ¿Debe usted tomar el establecimiento? ¿Cuáles son sus opciones? ¿Debe optar y seguir con una demanda individual?

Vamos a tratar estos temas en orden:

Dependiendo del estado en el que resides, frunciendo un DTPA (Ley de prácticas engañosas del comercio), contra Volkswagen llevará aproximadamente un año a dieciocho meses para concluir. Mientras que siento son algunas de las afirmaciones DTPA más fuerte que jamás he encontrado, la cantidad de daños, puede dejarse en manos de un jurado, que a veces es impredecible. Hay ciertos daños automáticos, si el jurado encuentra por ejemplo que el fraude se cometió. Estos daños realmente pueden triplicar la cantidad del premio.

La dificultad de optar hacia fuera es lo que pasa a su automóvil. Por desgracia, debe continuar conducir su vehículo, si está todavía en su posesión; y sería muy difícil vender sin optar en la corrección de las emisiones.

La conclusión es que usted quiere saber si vale la pena frunciendo los casos individuales, en lugar de aceptar la oferta de Volkswagens. Francamente, eso es una decisión personal porque los aspectos de negocio son el beneficio de tiempo de dinero, lo que significa recibiendo pago dentro de los próximos 60 a 90 días, que o fruncir litigio en el sistema legal que puede implicar una espera de aproximadamente un año a un año y medio. Los números que estamos viendo de Volkswagen no totalmente insultantes y son en realidad decente. Algunos pueden discrepar, pero de ninguna manera son insultantes.

Por lo tanto la conclusión es:

1. Para llevar a cabo litigios puede contar con un año o año y medio y usted tendría que aferrarse a su vehículo tal vez en un estado rupturas hasta que un acuerdo podría ser trabajado con Volkswagen en efectuar la revisión de control de emisiones.
2. Estos son reclamos muy fuertes de DTPA, pero son lentos, se dejan a los caprichos del sistema jurado.
3. El aspecto más atractivo del establecimiento de Volkswagen para usted, el cliente, es el hecho de que Volkswagen es pagar todos los honorarios asociados con esta afirmación.

Vamos a por supuesto, manteneros informados de cualquier avance tan pronto como los tengamos.

Atentamente,

Tim Maloney

926 S. Alamo, San Antonio, Texas 78205
Telephone (210)922-2200 • Toll Free (888)513-6198 • Facsimile (210)923-1313
www.maloneyandcampolo.com

*Licensed in Illinois

Volkswagen Opt Out Authorization

Name:

Address:

Phone Number:

Make/Model/Year of Vehicle:

Vehicle Identification # (VIN):

I am a (please circle one):

Owner

Lessee

I _____ wish to exclude myself from the Class Action Settlement in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672 (N.D. Cal.);

I understand that this means I am opting out of both the buyback and emissions modification offers.

Printed Name: _____

Your Signature _____ Date: _____



Volkswagen opta por autorización

Nombre:

Dirección:

Número de teléfono:

Marca/modelo/año del vehículo:

Identificación del vehículo (VIN) de #:

Soy un (por favor circule uno): propietario arrendatario

Yo, _____ deseo excluirme del establecimiento de la acción de clase en *en re: Volkswagen "Diesel limpio" Marketing, prácticas de ventas y litigios de responsabilidad de productos*, N° 3:15-md-2672 (N.D. caloría.);

Entiendo que esto significa que estoy optando fuera de la readquisición de acciones y emisiones oferta de modificación.

Imprimir nombre: _____

Su firma fecha _____

Volkswagen Settlement Decision

I _____ wish to accept the _____ offer.
(Print Name) (buyback or emissions modification)

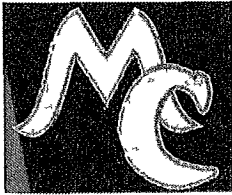
Or

I _____ wish to move forward with an individual lawsuit.
(Print Name)

*Opt Out Authorization must be sent to our office immediately. Our office has to receive it by September 12th.

Signature _____





LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*
tmaloney@maloneyandcampolo.com

PAUL E. CAMPOLO*
pcampolo@maloneyandcampolo.com

Decisión del establecimiento de Volkswagen

Yo, _____ deseo aceptar la oferta de _____.
(Nombre en imprenta) (modificación de recompra o emisiones)

O

Yo, _____ deseo seguir adelante con una demanda individual.
(Nombre en imprenta)

* Opt hacia fuera autorización deben enviarse a nuestra oficina inmediatamente. Nuestra oficina tiene que recibir por 12 de septiembreth.

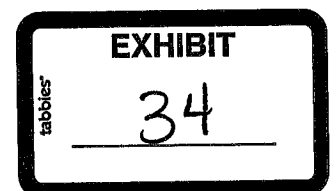
Firma _____

From: [REDACTED]
Sent: Wednesday, September 07, 2016 9:29 PM
To: [REDACTED]

Subject: Re: Your Volkswagen Settlement Offer & Decision

I wish to file the individual lawsuit against Volkswagen. I'm not going to look at the what they have to offer they put the knife in my back and I want it out and I want them to pay me for the damage they did to my vehicles at their expense, their fault they sold it now they can pay for it so whatever forms I have to submit you have my authority to sign them if you do need me to sign them and send me just that one for the individual lawsuit I will call you in the a.m. on Thursday the 8th of September for clarification on this email thank you for your time your patience and your Indulgence.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



EMAIL TO UTAH CLIENT COMPARING DAMAGE MODEL FOR INDIVIDUAL SUIT VS. VW OFFER:

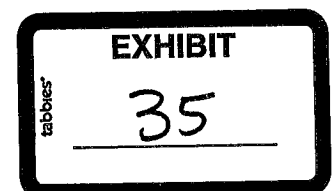
I can definitely understand your frustration and anger at Volkswagen's actions. Many consumers feel the same way you do. The decision is ultimately up to you, but as you are considering your options, I just want to give you a few things to think about. Volkswagen's buyback offer to you is actually pretty good. In addition to paying off the remaining loan balances on your vehicle, you will receive a total of \$12,439.73 yourself (plus any additional money you have paid to your lender at the time you turn in your vehicles).

If you do decide to pursue a lawsuit, Utah allows you to sue for your actual damages. Unfortunately, we cannot determine or predict what the actual damages will be because it will be left in the hands of the court or jury. I know you previously asked for a side-by-side comparison of the potential lawsuit outcome vs. the buyback offer. While the case is very strong against Volkswagen, there is never any guarantee about what the court or jury will find as your damages and ultimately award you. Therefore, you could come out with more, but you could also come out with less than you're being offered from Volkswagen now. The time frame for finalizing a lawsuit is also much longer than with the settlement – likely at least another year minimum. If you opt for the buyback, you should be able to return your vehicles and receive your payment at the end of October or early November. If you're not anxious to get your case settled, then this shouldn't be an issue, but I just wanted you to be aware. Additionally, keep in mind that while Volkswagen is paying attorney's fees for individuals who accept one of their settlement offers, if you opt out and pursue a lawsuit, attorney's fees and costs will come out of whatever you are awarded in court – Volkswagen will not be paying those fees.

Again, it is ultimately your decision, but I just wanted to give you things to consider as you're making your final choice. If you still wish to pursue a lawsuit, you will find an Opt-Out Authorization form attached, which you must sign and return to us before we can opt you out of the settlement. We have to provide a signed authorization to the Court by September 16th, or you will not be able to pursue a lawsuit, so we just ask that you return it no later than September 12th so we can file it before the deadline. If you decide to go with the buyback or emissions modification after all, you will just need to sign and return the Settlement Decision form, which I have also attached again for your convenience.

I hope this email will help answer some of the questions you have, but please don't hesitate to contact us if you need clarification on anything else.

Should you opt out and prevail either in court or out of court settlement under the dtpa VW will be responsible for paying attorney's fees.



September 12, 2016

Dear _____:

Recently you received the email below, along with your Volkswagen settlement offer and other documents pertaining to your decision about your claim. We have not yet received your response and want to remind you that the deadline to opt-out of Volkswagen's settlement offers and pursue an individual lawsuit is approaching. **If you have decided to pursue a lawsuit, please send your signed Opt-Out Authorization form to our office no later than 10:00 a.m. tomorrow, Sept. 14, 2016,** so that we can inform the Court of your decision before the imposed deadline of Sept. 16, 2016. **You will NOT be able to opt out and pursue an individual lawsuit if the Court does not receive a signed opt-out authorization by Sept. 16th.**

If you are accepting either the buyback or emissions modification offer from Volkswagen, you do not need to sign the Opt Out Authorization. Instead, simply complete, sign, and return the attached Volkswagen Settlement Decision Form letting us know which option you have decided on.

We appreciate your prompt attention to this matter. If you have any questions as you are making your decision, please do not hesitate to contact us.

Thank you.



Dear___:

Recientemente se recibió el correo electrónico, a continuación, junto con su oferta Volkswagen y otros documentos relacionados con su decisión sobre su reclamación. Aún no han recibido tu respuesta y quiere recordarles que se aproxima la fecha límite para optar por ofertas de liquidación de Volkswagen y perseguir una demanda individual. **Si usted ha decidido perseguir una demanda, por favor enviar la autorización firmada del Opt-Out formen a nuestra oficina no más tarde de 10:00 mañana, 14 de septiembre de 2016**, por lo que nos podemos informar a la corte de su decisión antes del plazo impuesto del 16 de septiembre de 2016. **Usted no será capaz de optar y perseguir un pleito individual si el Tribunal no recibe una autorización firmada de optar por el 16 de septiembre.**

Si usted acepta oferta de modificación de emisiones o recompra de acciones de Volkswagen, no necesita firmar la autorización Opt hacia fuera. En cambio, simplemente completar, firmar y regresar la Volkswagen establecimiento decisión forma hacernos saber que opción se haya decidido por.

Agradecemos su pronta atención a este asunto. Si usted tiene alguna pregunta mientras está tomando su decisión, no dude en contactar con nosotros.

Gracias.



Volkswagen Settlement Decision Form

I _____ wish to accept the _____ offer.
(Print Name) (buyback or emissions modification)

Signature _____



Decisión del establecimiento de Volkswagen

Yo, _____ deseo aceptar la oferta de _____.
(Nombre en imprenta) (modificación de recompra o emisiones)

Firma _____

Volkswagen Opt Out Authorization

Name:

Address:

Phone Number:

Make/Model/Year of Vehicle:

Vehicle Identification # (VIN):

I am a (please circle one):

Owner

Lessee

I _____ wish to exclude myself from the Class Action Settlement in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672 (N.D. Cal.);

I understand that this means I am opting out of both the buyback and emissions modification offers.

Printed Name: _____

Your Signature _____ Date: _____



Volkswagen opta por autorización

Nombre:

Dirección:

Número de teléfono:

Marca/modelo/año del vehículo:

Identificación del vehículo (VIN) de #:

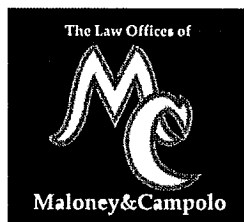
Soy un (por favor circule uno): propietario arrendatario

Yo, _____ deseo excluirme del establecimiento de la acción de clase en *en re: Volkswagen "Diesel limpio" Marketing, prácticas de ventas y litigios de responsabilidad de productos*, N° 3:15-md-2672 (N.D. caloría.);

Entiendo que esto significa que estoy optando fuera de la readquisición de acciones y emisiones oferta de modificación.

Imprimir nombre: _____

Su firma fecha _____



Name:

Thank you for informing us of your decision to accept Volkswagen's offer. We went on the portal to officially submit your claim and the following questions are required to finalize your decision. Depending on how you answer these questions, VW will ask us to upload relevant documents. We have gone through your file and taken inventory on the copies you have provided to us. We will be contacting you if additional documents are needed or if we need a cleaner copy of a document you have previously submitted.

Are you currently serving in the military or as a government contractor and stationed overseas?

Yes
No

Is the registered owner different than the name or names on the title?

Yes
No

Do you currently have any liens on the vehicle, other than a lien associated with any loan you took out to finance the vehicle?

Yes
No

Are you filing a claim on behalf of a decedent's estate?

Yes
No

Did your vehicle have a Branded Title of Assembled, Dismantled, Flood, Junk, Rebuilt, Reconstructed, or Salvaged on September 18, 2015?

Yes
No

Are you currently (i) an officer, director or employee of Volkswagen Group of America, Inc., Volkswagen Chattanooga Operations, Volkswagen Credit or a Volkswagen affiliate, OR (ii) an officer or director of a Volkswagen dealer? If you are not sure whether you fall within one of these categories, please contact our Settlement Support Team at 1-844-98-CLAIM for assistance.

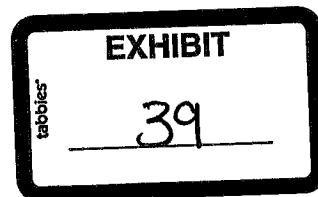
Yes
No

Are you a judicial officer or an immediate family member or member of the court staff of a judicial officer assigned to this case?

Yes
No

Is there more than one name on your registration?

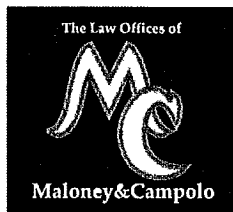
Yes
No



Co-Registered First Name

Co-Registered Middle Name

Co-Registered Last Name



Nombre:

Gracias por informarnos de su decisión de aceptar la oferta de Volkswagen. Fuimos en el portal para presentar oficialmente su reclamo y se requieren las siguientes preguntas para finalizar su decisión. Dependiendo de cómo usted responde a estas preguntas, VW nos pedirá subir los documentos pertinentes. Hemos ido a través de su archivo y tomado inventario en las copias que ha proporcionado a nosotros. Nos estaremos contactando lo si se necesitan documentos adicionales o si necesita una copia limpia de un documento que haya presentado previamente.

¿Es usted actualmente sirviendo en el ejército o como un contratista del gobierno y colocados en el extranjero?

Sí
No

¿Es el dueño registrado diferente que el nombre o nombres en el título?

Sí
No

¿Tienes cualquier gravamen sobre el vehículo, que no sea un privilegio asociado a los préstamos que se llevó a cabo para financiar el vehículo?

Sí
No

¿Está presentando un reclamo en nombre de un difunto?

Sí
No

¿Su vehículo tiene un título de marca de ensamblado, desarticulada, inundaciones, basura, reconstruido, reconstruyó o Salvaged en 18 de septiembre de 2015?

Sí
No

¿Está (i) un funcionario, director o empleado de Volkswagen Group of America, Inc., las operaciones de Chattanooga Volkswagen, Volkswagen crédito o filial de Volkswagen, OR (ii) un oficial o director de un concesionario Volkswagen? Si no está seguro de si caes dentro de una de estas categorías, póngase en contacto con nuestro equipo de soporte de acuerdo a 1-844-98-CLAIM para asistencia.

Sí
No

¿Es un funcionario judicial o un miembro de la familia inmediata o miembros del personal judicial de un oficial judicial asignado a este caso?

Sí
No

¿Hay más de un nombre en su registro?

Sí
No

Co registrado nombre nombre registrado Co Co registrado apellido

EXHIBIT
40

[illegible]

DOCUMENTS TO FINALIZE OFFER - Class Settlement Program Final Steps

COLOR	DECODER	DOCS SUBMITTED - FAX	DOCS ON FILE	PROBLEM/DOCS	WE DID FOR THEM PENDING	READY TO SEND	DOC UPLOADED ON PORTAL	CONTACT VW					
DECISION	REFERRAL	LAST NAME	FIRST NAME	Email for Documents?	REFERENCE #	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	date submitted
buyback													
buyback via email													
buyback				Yes- JB 9/27	161043804	CURRENT REGISTRATION	ID FRONT/BACK MANUEL	FINANCIAL CONSENT	ID FRONT/BACK FRANKIE				(on 10/8)
No decision yet													
buyback				Yes JB 10/3	161308051	NON-Class Settlement Proce	ID FRONT/BACK	TITLE FRONT/BACK	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback				Yes - JB 9/29	161254768	CURRENT REGISTRATION	ID FRONT/BACK	TITLE FRONT/BACK	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback				Yes JB 10/5	161396382	NON-Class Settlement Proce	ID FRONT/BACK KARLA	FINANCIAL CONSENT	ID FRONT/BACK RUBEN	ID ATTORNEY	POWER OF ATTORNEY		
No decision yet				mailed 10/3	161308401	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback													
No decision yet													
No Decision Yet													
buyback				Yes- JB 9/27	1607662	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT					PORTAL SUBMISSION
buyback													
buyback													
buyback				Yes JB 9/27	161253640	CURRENT REGISTRATION	ID FRONT/BACK	TITLE FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY			
buyback													
buyback				Yes JB 9/27	161308545	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback													
buyback				Yes - JB 9/27	161308597	ATTORNEY FRONT/BACK	ID FRONT/BACK - MARK	ID FRONT/BACK MARY	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
buyback				Yes - JB 9/27	160762627	ON-Class Settlement Proce	ID FRONT/BACK	TITLE FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY			
No decision yet													
buyback				Yes - JB 9/27	161228122	CURRENT REGISTRATION	ID FRONT/BACK - EST	OK Class Settlement Proce	ID FRONT/BACK - KATHARINE	ID ATTORNEY	POWER OF ATTORNEY		
buyback													
No decision yet													
no decision yet													
buyback													
buyback				Yes - JB 9/27	161266218	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY				
buyback													
buyback				Yes JB 9/27	161294501	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY				
buyback													
buyback													
Emissions Mod													
buy back				Yes - JB 9/27	161266218	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY			10/3
buyback				Yes - JB 9/27	161294501	CURRENT REGISTRATION	ID FRONT/BACK ROBERT	FRONT/BACK - MARK RE	ID ATTORNEY	POWER OF ATTORNEY			10/3
no decision yet													
buyback				Yes JB 9/30	161295583	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY			
buyback													
buyback													
buyback													
buyback				Yes - JB 9/30	160750294	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT					
buyback				Yes JB 9/27	161253707	CURRENT REGISTRATION	ID FRONT/BACK	TITLE FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY			
buyback verbal				mailed 10/3	161414988	CURRENT REGISTRATION	ID FRONT/BACK Juan	D FRONT/BACK Concepcion	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
vw offer email													
buyback				Yes - JB 9/27	161308935	CURRENT REGISTRATION	ID FRONT/BACK	IF person who has been identified as having					
No decision yet													
buyback													
buyback				Yes - JB 9/27	161043525	CURRENT REGISTRATION	ID FRONT/BACK JOSEPH	ID FRONT/BACK MARTINA	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
Emissions Mod				Yes JB 9/27	161437081	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY				
buyback				No - Spanish	161309103	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY				
No decision yet													
No Decision Yet													

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DOCUMENTS TO FINALIZE OFFER - Class Settlement Program Final Steps

[illegible]

DOCUMENTS TO FINALIZE OFFER - Class Settlement Program Final Steps

[illegible]

DOCUMENTS TO FINALIZE OFFER - Class Settlement Program Final Steps

[illegible]

DOCUMENTS TO FINALIZE OFFER - Class Settlement Program Final Steps

COLOR	DECODER	DOCS SUBMITTED - FAX	DOCS ONLINE	PROBLEM/DOCS	WE DID FOR THEM	PENDING - READY TO SEND	DOCS UPLOADED ON PORTAL	CONTACT/ATTN					
DECISION	REFERRAL	LAST NAME	FIRST NAME	Email for Documents?	REFERENCE #	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	DOCUMENT NEEDED	date submitted	
buyback				Yes - JB 9/29	160852351	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT					
buyback													
buyback				Yes - JB 9/30	161225783	ON Class Settlement Progs	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		10/8	
buyback													
buyback													
buyback				Yes - JB 9/29	161044417	CURRENT REGISTRATION	ID FRONT/BACK - ADRIANA	ID FRONT/BACK - LISA	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
buyback				Yes - JB 9/29	160933065	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			10/18	
Emissions Mod				Yes - JB 9/30	160797105	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback - verbal													
Buyback													
Emissions Mod via en													
buyback - verbal													
buyback				Yes JB 9/29	160742104	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT					
buyback				Yes JB 9/29	161375864	CURRENT REGISTRATION	ID FRONT/BACK	ON Class Settlement Progs	ID ATTORNEY	POWER OF ATTORNEY			
No decision yet													
buyback				Yes JB 9/29	161396728	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY				
buyback				Yes - JB 9/30	161228325	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY			
no offer - verbal													
Buyback													
buyback													
Buyback				Yes JB 9/30	160905049	CURRENT REGISTRATION	ID FRONT/BACK	FINANCIAL CONSENT	ID ATTORNEY FRONT/BACK	POWER OF ATTORNEY			
buyback				Yes - JB 9/29	161342443	CURRENT REGISTRATION	ID FRONT/BACK - JAMIE	FINANCIAL CONSENT	ID FRONT/BACK - CLAYTON	ID ATTORNEY	POWER OF ATTORNEY		
no decision yet													
No decision yet													
buyback													
Emissions Mod				Yes - JB 9/29	160976294	ON Class Settlement Progs	ID FRONT/BACK THOMAS	ID FRONT/BACK MARIA	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
buyback													
buyback				Yes JB 9/29	161425825	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY				
buyback													
no offer to lawyer													
buyback													
Emissions Mod				Yes - JB 9/29	161256783	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY				
Emissions Mod				Yes - JB 9/29	160814243	CURRENT REGISTRATION	ID FRONT/BACK - ERIN	ID FRONT/BACK - JIM	2nd Owner				
No decision yet				Yes - JB 9/29	161227625	CURRENT REGISTRATION	ID FRONT/BACK - RHONDA	ID FRONT/BACK - JIM	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY	10/8	
buyback													
Buyback				Yes - JB 9/29	161294092	CURRENT REGISTRATION	ID FRONT/BACK - RUSSELL	ID FRONT/BACK - ELVIRA	FINANCIAL CONSENT	ID ATTORNEY	ATTORNEY (need 1 more witness)		
buyback													
buyback													
buyback				Yes - JB 9/29	161085572	REGISTRATION	ID FRONT/BACK - FRANK	ID FRONT/BACK - ELIZABETH	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
buyback													
Emissions Mod via en													
buyback				Yes JB 9/29	161321923	CURRENT REGISTRATION	ID FRONT/BACK	ID ATTORNEY	POWER OF ATTORNEY	to name on signed on offer			
buyback				Yes JB 9/29	161365644	ON Class Settlement Progs	ID FRONT/BACK - SHANE	ID FRONT/BACK - KIMBERLY	FINANCIAL CONSENT	ID ATTORNEY	POWER OF ATTORNEY		
Emissions Mod													

*****FOR INSTRUCTIONAL PURPOSES ONLY*****

*In re Volkswagen "Clean Diesel" Marketing, Sales, Practices, and Products Liability
Litigation, MDL No. 2672 (N.D. Cal.)*

**VOLKSWAGEN BUYBACK/LEASE TERMINATION/EMISSIONS MODIFICATION
AUTHORIZATION – LIMITED POWER OF ATTORNEY**

The undersigned hereby appoints The Law Offices of Maloney & Campolo to act on
[NAME OF RETURNING PARTY]
Print Your Name behalf for the limited purpose of submitting a claim under the
[MY/NAME OF ENTITY S]
Volkswagen 2.0-liter TDI Class Action Settlement, and completing the buyback transaction,
lease termination or emissions modification for Print Your Name,
[MY/NAME OF ENTITY S]
Make/Model/Year, VIN as applicable.
[VEHICLE MAKE, MODEL, AND YEAR] [INSERT VIN]

This authorization and limited power of attorney takes effect on the date signed, and shall continue until the earlier of the following: (i) the completion of the buyback transaction, lease termination or emissions modification, as applicable, whichever comes first, or (ii) the undersigned terminates it in writing and Volkswagen Group of America, Inc. ("Volkswagen") receives notice of the revocation. Any termination of this authorization and limited power of attorney pursuant to (ii) above shall not be effective to Volkswagen¹ until Volkswagen Group of America, Inc. ("VWGoA") has actual knowledge of the revocation. This authorization and limited power of attorney shall terminate immediately if Print Your Name dies or
[THE UNDERSIGNED]
becomes incapacitated or The Law Offices of Maloney & Campolo ceases to exist.
[NAME OF ENTITY]

The undersigned agrees that VWGoA, Ankura Consulting Group, LLC (the "Claims Supervisor") and the lawyers appointed by the Court as the Settlement Class Counsel in the Volkswagen "Clean Diesel" litigation may act under this power of attorney. VWGoA, the Claims Supervisor and the Settlement Class Counsel may seek identification of the individual appointed attorney-in-fact and agent under this power of attorney. The undersigned agrees to indemnify and hold harmless Volkswagen for any claims that arise against Volkswagen because of reliance on this power of attorney.

SIGN HERE

¹ Volkswagen shall mean Volkswagen AG, Volkswagen Group of America, Inc. (d/b/a Volkswagen of America, Inc. or Audi of America, Inc.), Volkswagen Group of America Chattanooga Operations, LLC, Audi AG, Audi of America, LLC, VW Credit, Inc., VW Credit Leasing, Ltd., Audi Financial Services, VCI Loan Services, LLC, for each of the foregoing, their respective former, present, and future affiliates, parent companies, subsidiaries, predecessors, successors, agents, representatives, administrators, receivers, divisions, dealers, joint ventures, assigns, general partners, limited partners, attorneys, principals, officers, directors, employees, members, contractors, subcontractors and/or suppliers

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*In re Volkswagen "Clean Diesel" Marketing, Sales, Practices, and Products Liability
Litigation, MDL No. 2672 (N.D. Cal.)*

Dated: Todays Date

By (signature): _____



Name: Print Your Name
[PRINT NAME]²

Name of Entity (if applicable): The Law Offices of Maloney & Campolo
[PRINT NAME OF ENTITY]³

Title: _____
[PRINT BUSINESS TITLE]⁴

ATTESTATION

Choose 1 option.

The following two witnesses **OR** Notary Public witnessed the execution of this document.

Witnesses can be anyone (including family)

Witness #1: _____ Dated: _____ Signature: _____
Print Name

Witness #2: _____ Dated: _____ Signature: _____
Print Name

OR

STATE OF _____, COUNTY OF _____

BEFORE ME, the undersigned authority, appeared on the Signature Date shown and acknowledged under oath to my satisfaction that he/she has signed, sealed, and delivered this document as his or her act and deed for the purposes therein expressed and in the capacity therein expressed.

Dated: _____

NOTARY PUBLIC

² Note: If Power of Attorney is for an entity, must match name of individual on Proof of Entity document and Government Issued ID provided.

³ Note: If Power of Attorney is for an entity, must match name of entity on Proof of Entity document provided.

⁴ Note: If Power of Attorney is for an entity, must match business title of individual in Proof of Entity document provided.

VOLKSWAGEN

GROUP OF AMERICA

Consent to Release Information Needed for Vehicle Buyback

Because there is an outstanding loan on this vehicle, written consent is required from the accountholder for the lender to release the information that will be required to confirm the outstanding loan balance and payoff amount. Without this information, a vehicle buyback under the terms of the VW/Audi Diesel Emissions Settlements cannot be completed. Information obtained from lenders will not be used for any other purpose than to confirm outstanding loan balances and payoff amounts.

For questions please call the Settlement Support Team at 1-844-98-CLAIM.

Please complete all sections of this form and return it to Volkswagen. There are three ways that you can return this form to Volkswagen:

- (1) Upload it to your account on the Claims Portal;
- (2) Send it via fax to. 248-754-6602, or
- (3) Mail it to VW / Audi Emissions Settlement Claims Processing
P.O. Box 214500
Auburn Hills, MI 48326

Your Name(s).																	
Your Reference or Claim. (9 Digits)	1	6	1	3	7	5	4	0	7								
Vehicle Identification Number (VIN) (17 digits).	3	V	W	L	L	7	A	J	7	E	M	3	7	2	3	3	0
Your Contact Phone Number	- -																
Lender Name	University Federal Credit Union																
Lender Phone	(512) 467-8080																
Lender Address:	PO BOX 9350 Austin, TX 78766																
Name(s) on Account:																	
Account Number																	
Last 4 Digits of Social Security Number associated with account.	5111																

By signing this form, I authorize the release of all information pertaining to my lease, loan, or title, including but not limited to contract, interest paid, payment history, and payoff information, to Volkswagen of America, Inc., an organizational unit of Volkswagen Group of America, Inc., Ankura Consulting Group, LLC, as the Court-Appointed Claims Supervisor, and lawyers appointed by the Court as Settlement Class Counsel in the Volkswagen "Clean Diesel" litigation.

Accountholder Signature

Date

Accountholder Signature

Date

